ENVIRONMENTAL ASSESSMENT FOR CONSTRUCTION AND OPERATION OF THE PUTNAM READINESS CENTER IN PUTNAM, CONNECTICUT

CONNECTICUT ARMY NATIONAL GUARD

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Proponent: Connecticut Army National Guard
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Environmental Assessment Organization

This Environmental Assessment (EA) evaluates the potential environmental, socioeconomic, and cultural effects for the Connecticut Army National Guard's (CTARNG) proposed construction and operation of the a Readiness Center in Putnam, Windham County, Connecticut. The CTARNG currently lacks facilities in the northeastern region of Connecticut and the proposed Putnam Readiness Center (PRC) would remedy this.

The potential effects of the Proposed Action and considered alternatives are analyzed in this EA pursuant to the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA, and 32 CFR Part 651, Environmental Analysis of Army Actions. This EA will facilitate the decision-making process by the CTARNG and the National Guard Bureau (NGB) regarding the Proposed Action and its considered alternatives, and is organized as follows:

- **EXECUTIVE SUMMARY:** Describes the Proposed Action and its considered alternatives; summarizes environmental, cultural, and socioeconomic consequences; and compares potential effects associated with the considered alternatives, including the No Action Alternative.

- **SECTION 1.0 PURPOSE, NEED AND SCOPE:** Summarizes the purpose of and need for the Proposed Action, provides relevant background information, and describes the scope of the EA.

- **SECTION 2.0 DESCRIPTION OF THE PROPOSED ACTION AND THE ALTERNATIVES:** Describes the Proposed Action and presents alternatives for implementing the Proposed Action.

- **SECTION 3.0 AFFECTED ENVIRONMENT:** Describes the existing environmental, cultural, and socioeconomic conditions which may be affected by the Proposed Action or one of the alternatives.

- **SECTION 4.0 ENVIRONMENTAL CONSEQUENCES:** Identifies individual and cumulative potential environmental, cultural, and socioeconomic effects of implementing the Proposed Action and alternatives and identifies proposed mitigation measures.

- **SECTION 5.0 COMPARISON OF ALTERNATIVES AND CONCLUSIONS:** Compares the potential environmental effects of the considered alternatives and summarizes the significance of individual and expected cumulative effects of these alternatives.

- **SECTION 6.0 REFERENCES:** Provides bibliographical information for cited sources.

- **SECTION 7.0 LIST OF PREPARERS:** Identifies document preparers and their areas of expertise.

- **SECTION 8.0 AGENCIES AND INDIVIDUALS CONSULTED:** Lists agencies and individuals consulted during EA preparation.

- **APPENDIX A: Scoping Notice Letters and Agency Comments**

- **APPENDIX B: Greenhouse Gas Emission Data**

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Environmental Assessment Signature Page

Lead Agency:	National Guard Bureau
Cooperating Agencies:	None
Title of Proposed Action:	Putnam Readiness Center
Affected Jurisdiction:	Putnam, Connecticut (CT)
Point of Contact:	Robert Dollak, Environmental Program Manager, Connecticut Army National Guard, 360 Broad Street, Hartford, CT 06105
Proponents:	Connecticut Army National Guard (CTARNG)

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Document Designation: Draft Environmental Assessment

Abstract: CTARNG proposes to construct and operate a new Readiness Center in the town of Putnam, to support the CTARNG 643rd Military Police. The purpose of the Proposed Action is to provide a facility in northeast Connecticut for the local CTARNG soldiers to convene, store equipment, and be readily accessible to assist in emergencies.

This EA evaluates the individual and cumulative effects of the Proposed Action Alternative and the No Action Alternative with respect to the following criteria: land use; air quality; noise; geology, topography, and soils; water resources; biological resources; cultural resources; socioeconomics; environmental justice; infrastructure; and hazardous and toxic materials/waste. Three additional on-site design alternatives and an Alternative Location alternative were eliminated from further consideration.

The evaluation performed in this EA concludes that no significant adverse impacts, either individual or cumulative, would occur to environmental resources resulting from the Proposed Action. The analysis presented indicates that an EIS is unnecessary for this Proposed Action and issuance of a FONSI is appropriate.

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Executive Summary

This Environmental Assessment (EA) evaluates the proposal of the Connecticut Army National Guard (CTARNG) to construct and operate a new Readiness Center in the town of Putnam, Windham County, Connecticut to support the CTARNG 643rd Military Police.

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA), as implemented by the Council on Environmental Quality (CEQ) NEPA regulations (40 Code of Federal Regulations [CFR] §§1500-1508); Army NEPA implementing procedures (32 CFR Part 651, *Environmental Analysis of Army Actions)*; and the 2011 Army National Guard (ARNG) NEPA Handbook. This EA will facilitate the decision-making process regarding the Proposed Action and its alternatives considered by the CTARNG.

PURPOSE AND NEED

The purpose of the Proposed Action is to provide a facility in northeast Connecticut for local CTARNG soldiers to convene, store equipment, and be readily accessible to assist in emergencies. The Putnam Readiness Center is part of the CTARNG Long Range Construction Plan, dated February 21, 2020. Currently, the Westbrook Armory, located on the south coast of Connecticut in the Town of Westbrook and over 60 miles from the proposed PRC site, houses the unit that will occupy the PRC. Windham County has lacked a military reserve facility since 2008. Construction of the PRC would allow the CTARNG to connect with Putnam and surrounding communities and would provide a local center to support state and national military capabilities, and enrich the community it serves.

PROPOSED ACTION AND ALTERNATIVES

The Proposed Action is construction and operation of a PRC on a 17.00-acre portion of a 19.67-acre State-owned parcel on Pomfret Street (Route 44) in Putnam, Connecticut. The property is currently occupied by several large paved parking areas connected by driveways, two Connecticut Department of Developmental Services (DDS) buildings, and wooded areas. Currently, approximately 6.2 acres of the PRC site have been disturbed, including 1.27 acres of existing 100-foot wetland buffer disturbance. CTARNG's Proposed Action would result in a total area of permanent disturbance of approximately 6.56 acres.

Construction of the Proposed Action would result in no direct wetland impacts (i.e., no filling of wetlands) but would have 1.15 acres of permanent impacts within 100-foot wetland buffers. The Proposed Action would require clearing of approximately 0.81 acres of wooded areas.

Between 150 and 175 CTARNG soldiers would train at the PRC one weekend per month and two weeks per year of duty. Approximately five full-time staff would be on site for day-to-day PRC operations. Over drill weekends, approximately 30 to 40 military vehicles (e.g. wheeled vehicles such as Humvees, armored security vehicles, and supporting cargo trailers) would move to and from the PRC along local/regional roadways. Field-based training events and weapons qualifications for PRC members would occur at other existing CTARNG properties. Housing for soldiers would not be provided at the PRC. No vehicle maintenance facility or fuel trucks would be provided on the site.

CTARNG examined and eliminated from further consideration the following alternatives because one or more of the screening criteria identified in Section 2.3.1 was not satisfied:

- Alternative 2 (Western Building and Split POV Parking) was eliminated due to screening criteria c.: adverse environmental impacts due to additional clearing requirements.
- Alternative 3 (Western Building and Combined POV Parking) was eliminated due to screening criteria c.: adverse environmental impacts due to grading needs and visual impact.
- Alternative 4 (Central Building and Direct Wetland Impact) was eliminated due to screening criteria c.: significant adverse environmental impacts to the wetland.
- Alternative 5 (Alternative Location) was eliminated due to screening criteria a.: the project's purpose and need was not satisfied since CTARNG's presence would not be established in northeast Connecticut.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Identified resource areas that could be affected by the construction and operation of the PRC include the following: land use; air quality; noise; geology, topography, and soils; water resources; biological resources; cultural resources; socioeconomics; environmental justice; infrastructure; and hazardous and toxic materials/ waste.

Potential Environmental consequences of the Proposed Action were identified for each of these resources, along with best management practices intended to minimize any minor adverse impacts.

COMPARISON OF ALTERNATIVES AND CONCLUSIONS

Compared to the eliminated alternatives, the Proposed Action minimizes effects on water resources (i.e. wetlands and wetland buffers), reduces clearing, and allows for a 50-foot ATFP buffer to comply with DoD standards, therefore; it is the preferred alternative for development of the PRC.

The No Action Alternative serves as the baseline from which to compare the potential impacts of the Proposed Action. While the No Action Alternative would not produce any adverse environmental impacts, it would not satisfy the purpose and need for the project.

Based on the findings of this EA, no significant adverse impacts would occur to environmental resources resulting from the Proposed Action. The analysis presented indicates that an Environmental Impact Statement (EIS) is unnecessary for this Proposed Action Alternative and issuance of a Finding of No Significant Impact (FONSI) is appropriate.

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Acronyms and Abbreviations

AADT	Average Annual Daily Traffic
ACS	Archaeological Consulting Services
APE	Area of Potential Effects
ARNG	Army National Guard
ARNG-IEZ	ARNG-Installations & Environment Directorate
ATFP	Antiterrorism Force Protection
BMPs	Best Management Practices
CAA	Clean Air Act
CDOT	Connecticut Department of Transportation
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability
CFR	Code of Federal Regulations
CTARNG	Connecticut Army National Guard
CGS	Connecticut General Statutes
CWA	Clean Water Act
DDS	Department of Developmental Services
DEEP	Department of Energy and Environmental Protection
DoD	Department of Defense
EA	Environmental Assessment
ECOP	Environmental Condition of Property
EIS	Environmental Impact Statement
ESA	Environmental Site Assessment
ETPH	Extractable Total Petroleum Hydrocarbons
EV	Electric vehicle
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
FY	Fiscal Year
GHG	Greenhouse gas
HTMW	Hazardous Toxic Materials/Waste
IICEP	Interagency/Intergovernmental Coordination of Environmental Planning
LEED	Leadership in Energy and Environmental Design
MILCON	Military Construction Project Number
MBTA	Migratory Bird Treaty Act
NAAQS	National Ambient Air Quality Standards
NAC	Native American Consultation
NEPA	National Environmental Policy Act
NGB	National Guard Bureau
NLEB	Northern Long-eared bat
NOA	Notice of Availability

NOI	Notice of Intent
NRCS	Natural Resource Conservation Service
OPM	Office of Policy and Management
ORG	Organization parking
OSHA	Occupational Safety and Health Administration
PAH	Polycyclic Aromatic Hydrocarbons
PIWWC	Putnam Inland Wetlands and Watercourses Commission
POCD	Town of Putnam Plan of Conservation and Development
POV	Privately-Owned Vehicle parking
PRC	Putnam Readiness Center
RCRA	Resource Conservation and Recovery Act
RCSA	Regulations of Connecticut State Agencies
RECs	Recognized Environmental Conditions
ROI	Region of Influence
SHPO	State Historic Preservation Office
UFC	Unified Facilities Criteria
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USC	United States Code
USFWS	United States Fish and Wildlife Service
VOC	Volatile Organic Compounds

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1.0 PURPOSE OF AND THE NEED FOR THE PROPOSED ACTION

1.1 Introduction

The Connecticut Army National Guard (CTARNG) proposes to construct and operate a new Readiness Center in the town of Putnam, Windham County, Connecticut to support the CTARNG 643rd Military Police. The proposed Putnam Readiness Center (PRC) will be located on a 17.00-acre portion of a 19.67-acre irregularly shaped State-owned parcel on the south side of Pomfret Street (Route 44), west of Interstate Route 395 (I-395) in Putnam, Connecticut (Figure 1).

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA), as implemented by the Council on Environmental Quality (CEQ) NEPA regulations (40 Code of Federal Regulations [CFR] §§1500-1508); Army NEPA implementing procedures (32 CFR Part 651 *Environmental Analysis of Army Action*); and the 2011 Army National Guard (ARNG) NEPA Handbook. This EA will facilitate the decision-making process regarding the Proposed Action and its alternatives considered by the CTARNG.

1.2 Purpose and Need

The purpose of the proposed action is to provide a facility in northeast Connecticut for the local CTARNG to convene, store equipment, and be readily accessible to assist in emergencies. The Putnam Readiness Center is part of the CTARNG Long Range Construction Plan. CTARNG currently operates 12 readiness centers throughout Connecticut, none within Windham County. Currently, the Westbrook Armory, located on the south coast of Connecticut in the Town of Westbrook and over 60 miles from the proposed PRC site, houses the unit that will occupy the PRC. The Westbrook Armory is a 1960s era facility that has insufficient space for the personnel, vehicles, and equipment now associated with and authorized for this type of unit. The Westbrook Armory will continue to house the unit until construction of the PRC is complete, at which time the Westbrook Armory will close.

A CTARNG armory was previously located on Keech Street in Putnam, Connecticut. Changes to the size and mission of the unit formerly occupying this armory (250th Multi-Role Bridge Company) led to the closure of the facility in 2008 due to its being far too small to support the unit's personnel and equipment. Since then, much of northeastern Connecticut and all of Windham County has lacked a CTARNG facility. While Windham County borders both Rhode Island and Massachusetts, it is not typical for units from other states to respond to emergencies in Connecticut.

The PRC will be constructed on property along Pomfret Street in Putnam, Connecticut. Two buildings associated with the former John N. Dempsey Center occupy the northern portion of the property. The

former John N. Dempsey Center was part of the Connecticut Department of Developmental Services (DDS), whose mission is to work with individuals, their families and other support groups to develop long-term strategies for people with disabilities to live full lives in their communities.

All new CTARNG readiness centers must comply with National Guard Pamphlet 415-12, *Construction, Army National Guard Facilities Allowances* (NGB 2015). ARNG is transitioning from antiquated, single-purpose state armories into multi-purpose readiness centers. These readiness centers are designed to support State and Federal armed forces requirements for national defense, homeland security, and disaster response. Mission essential facilities, like the PRC, will provide for the overall health, safety, training, and quality of life for the CTARNG. The objective is to promote unit readiness and mission preparedness by providing sufficiently sized and adequate facilities to meet training, administrative, and logistical requirements to fulfill CTARNG's State and Federal missions. Construction of the PRC would allow the CTARNG to connect with Putnam and the surrounding communities and would provide a local center to support current missions, preserve long-term military capabilities, support the mission of the Department of Defense (DoD), and enrich the community it serves.

1.3 Scope of Environmental Assessment

This EA identifies, documents, and evaluates the potential environmental, cultural, and socioeconomic effects of the analyzed alternatives (detailed in Section 2.3) in accordance with 32 CFR Part 651, *Environmental Analysis of Army Actions*, CEQ Regulations, and the 2011 ARNG NEPA Handbook. It includes an evaluation of direct, indirect, and cumulative impacts, both temporary and permanent, that could occur as a result of implementing the described actions and informs decision makers and the public of the potential environmental consequences of the Proposed Action and Alternatives. The EA describes mitigation measures/Best Management Practices (BMPs) that are associated with the described actions.

Under NEPA, the analysis of environmental conditions only addresses those areas, or Region of Influence (ROI), and environmental resources with the potential to be affected by the Proposed Action or Alternatives. Locations and resources with no potential to be affected are not analyzed. The ROI may vary by resource. The Army's NEPA implementation regulation (32 CFR Part 651) calls for the environmental analysis to be proportionate to the nature and scope of the action, the complexity and level of anticipated effects on important resources, and the capacity of Army decisions to influence those effects in a productive, meaningful way from the standpoint of environmental quality.

1.4 Decision Making

Pursuant to DoD Directive 5105.77, dated 30 October 2015 (DOD 2015), the NGB is a joint activity of the DoD. NGB serves as a channel of communication and funding between the U.S. Army and state ARNG organizations in the 54 U.S. states, territories, and the District of Columbia. The ARNG is a Directorate within NGB. The ARNG's Installation and Environment Directorate (ARNG I&E) is the division within ARNG that is responsible for environmental matters, including compliance with NEPA. As ARNG is the Federal decision-maker concerning this Proposed Action, this is a Federal Proposed Action. The Federal decision-making on the part of the ARNG includes selecting an alternative to implement, and identifying the actions that the Government will commit to undertake to minimize environmental effects, as required under NEPA, CEQ Regulations, and 32 CFR Part 651.

This EA analyzes the potential for significant environmental effects associated with the Proposed Action and Alternatives. If the analyses presented in this EA indicate that the Proposed Action would not result in significant environmental or socioeconomic effects, then a Finding of No Significant Impact (FONSI) will be prepared. A FONSI briefly presents the reasons why an Environmental Impact Statement (EIS) would not be necessary. The FONSI will be signed by the decision-maker (ARNG-G9) to indicate his or her review and approval. Prior to initiation of the Proposed Action, the FONSI will be made available to the public for a 30-day period at the Putnam Public Library.

If the analysis presented in this EA indicates that significant adverse environmental effects would result from the Proposed Action that cannot be mitigated to insignificant levels, a Notice of Intent (NOI) to prepare an EIS would be required or no action would be taken.

1.5 Public and Agency Involvement

Federal agencies, federally recognized Native American tribes, and State and local agencies were invited to contribute to this EA through the Interagency/Intergovernmental Coordination of Environmental Planning (IICEP) and Native American Consultation (NAC) processes, which assisted the CTARNG in determining the appropriate scope for the EA. Pertinent Federal regulatory agencies included the US Fish and Wildlife Service (USFWS), US Environmental Protection Agency (USEPA), US Army Corps of Engineers (USACE), and US Department of Agriculture – Natural Resources Conservation Service (NRCS). Connecticut agencies included in the NEPA scoping process were Department of Energy and Environmental Protection (DEEP), Council on Environmental Quality, Office of Policy and Management (OPM), Department of Transportation, Department of Emergency Services and Public Protection, and State Historic Preservation Office (SHPO). Local agencies included Putnam Planning Commission, Putnam Zoning Commission, Putnam Inland Wetlands and Watercourses Commission, and the Mayor of

Putnam, Connecticut. Two (2) federally recognized Native American tribes were consulted: Mohegan Tribe and Mashantucket Pequot Indian Tribe. Please refer to Section 8.0 for a complete list of agencies and individuals consulted during the 2019 scoping process.

Letters sent in April 2019 to these agencies and tribes requesting input in the scoping process, and comments received, are included in Appendix A. No responses were received from USFWS, SHPO, or the two Native American tribes during the initial scoping process.

Letters were sent to the USFWS, SHPO, and the two Native American tribes for a second time in October of 2020. No written responses were received from any of the scoping agencies. USFWS was contacted directly via telephone and email in December 2020 and January 2021 for comment but CTARNG received no response.

Connecticut DEEP responded to the May 2019 scoping letter and sent recommendations for low impact development, idling restrictions, electric vehicle (EV) readiness, and clean vehicle use. DEEP encouraged green infrastructure and/or low impact development features to be used in the final design of the PRC as well as recommending that 10 percent of all parking spaces at the PRC be made to accept EV charging stations. The final construction design will take DEEP's comments into consideration. A copy of the DEEP scoping response is included in Appendix A.

The CTARNG, as the proponent of the Proposed Action, will publish and distribute the final EA and draft FONSI for a 30-day public review and comment period, as announced by a Notice of Availability published in the *Putnam Town Crier* and *Hartford Courant*. Review copies will also be made available for public review at the Putnam Public Library located at 225 Kennedy Drive, Putnam, Connecticut 06260. The CTARNG's Environmental Office will be responsible for receiving comments submitted during the 30-day public comment period. If it is determined that implementation of the Proposed Action would result in significant impacts, the CTARNG will either not implement this action as proposed, or will publish in the Federal Register a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS). Throughout this process, the public may obtain information on the status and progress of the EA through the Connecticut National Guard Public Affairs Office at (860) 524-4857. Persons interested in receiving copies of the EA or the FONSI may contact Robert Dollak, 360 Broad Street, Hartford, Connecticut 06105; Robert.f.dollak.nfg@mail.mil. The Final EA and Draft FONSI will also be posted to the CTARNG website for public access. During the public comment period, any comments received by the CTARNG will be addressed and incorporated into the Final EA, if warranted, and into the FONSI prior to signature.

1.6 Related NEPA, Environmental, and Other Documents and Processes

The following PRC planning and environmental documents related to the Proposed Action were reviewed during preparation of this EA:

a. Connecticut Army National Guard Readiness Center Transformation Master Plan, June 2014;

b. Phase I Environmental Site Assessment/Environmental Condition of Property Assessment, October 2017;

c. Phase II Environmental Site Assessment/Environmental Condition of Property Assessment, August 2018;

d. Bat Acoustic Inventory, Connecticut National Guard Property, Putnam, CT, June 2018; and

e. Phase 1 Archaeological Reconnaissance Survey of the CTARNG Putnam Regional Readiness Center in the Town of Putnam, Connecticut, September 2018.

1.7 Regulatory Framework

The Proposed Action and Alternatives are subject to the following Federal and State environmental regulations:

a. National Environmental Policy Act of 1969 (NEPA), as amended (42 USC 4321 et seq.);

b. National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions (86 FR 10252);

c. Council on Environmental Quality's (CEQ) Regulations (40 CFR 1500-1508);

d. Environmental Analysis of Army Actions (32 CFR Part 651);

e. Clean Air Act (CAA), as amended (42 USC 7401 et seq.), as amended 1990;

f. USEPA General Conformity Rule (40 CFR 93, Subpart B for federal agencies and 40 CFR 51, Subpart W for state requirements);

g. Clean Water Act (CWA) (33 USC 1251 et seq.);

h. US Army Corps of Engineers, Section 404 Water Quality Certification;

i. CT DEEP 401 Water Quality Certification;

j. CT DEEP Inland Wetlands Permit;

k. Occupational Safety and Health Administration;

l. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980;

m. Executive Order 11990, Protection of Wetlands;

n. Executive Order 12898, Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations;

o. Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks;

p. Executive Order 13174, Consultation and Coordination with Indian Tribal Governments;

q. Executive Order 11988, Floodplain Management;

r. Endangered Species Act of 1973 (16 USC 1531 et seq.);

s. Connecticut General Statutes (CGS), Section 25-68d;

t. Regulations of Connecticut State Agencies (RCSA), Section 25-68h-3; and

u. CT DEEP Stormwater Pollution Control Plan.

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

The construction and operation of the PRC would provide a facility of sufficient size and modern design to efficiently achieve and maintain mission and training requirements. Section 2.2 provides a detailed description of the Proposed Action and Section 2.3 describes the considered alternatives.

2.2 Proposed Action

The Proposed Action (Alternative 1, the preferred alternative) is construction and operation of a PRC on a 17.00-acre portion ("PRC site", or "site") of a 19.67-acre irregularly shaped State-owned property on the south side of Pomfret Street (Route 44), approximately one mile west of Interstate Route 395 in Putnam, Connecticut (Figure 1). The property, owned by the State of Connecticut, is located at 376 and 390 Pomfret Street (Route 44) in Putnam, Connecticut. The property is currently occupied by several large, paved parking areas connected by driveways, two DDS buildings formerly associated with the John N. Dempsey Center, and wooded areas (Figure 1). The DDS buildings include an administrative office building and a flower shop. Additional buildings on the property previously associated with the John N. Dempsey Center, including two residential cottages, a house, a garage, and a portion of the administrative building, were demolished in 2019. The areas where these buildings formerly stood are currently vacant. Under existing conditions, approximately 6.2 acres of the PRC site have been previously disturbed by facilities associated with the former John N. Dempsey Center, including 1.27 acres of existing 100-foot wetland buffer disturbance.

The PRC would include a Readiness Center with a footprint of approximately 0.66 acres on the northeast side of the property, 1.16 acres of CTARNG organization (ORG) parking on the southwest side of the site, and 1.24 acres of privately-owned vehicle (POV) parking (divided into 1.00 acre towards the northwest of the site and 0.24 acre immediately southwest of the building). Once the parking areas are constructed, they would be utilized as temporary equipment staging areas during the remainder of construction. As planned, space for 150 civilian vehicles to park will be provided during operation of the PRC. Associated infrastructure for the PRC would include utility services, information systems, fire detection and alarm systems, roads, walks, curbs, gutters, and storm drainage. The total area of permanent disturbance for the Proposed Action is approximately 6.56 acres (Figure 2.1).

The Proposed Action includes construction of a 50-foot Antiterrorism Force Protection (ATFP) buffer, which meets the criteria for minimum standoff distance described in *DoD Minimum Antiterrorism Standards for Buildings* (UFC 2018). A loop road around the PRC building would allow access to the rear

of the building for operations and maintenance and assist with maintaining clear space within the ATFP buffer. Eight-foot-high chain link fencing would secure the perimeter of the PRC and would be posted with multiple "Keep Out. State Military Reservation" signs. No vehicle maintenance facility or fuel trucks would be provided on the site. Vehicle maintenance would be performed at Camp Hartell in Windsor Locks, Connecticut.

Inland wetlands located on the property are shown on Figure 2.1. Construction of the Proposed Action would result in no direct wetland impacts (i.e., fill) but would have 1.15 acres of permanent impacts within the 100-foot wetland buffer regulated by the Putnam Inland Wetlands and Watercourses Commission (PIWWC). Of this, 1.07 acres are within the existing disturbed wetland buffer area and 0.08 acres would be new wetland buffer disturbance. The Proposed Action would require clearing of approximately 0.81 acres of wooded areas. Following construction of the Proposed Action, 9.73 acres of wooded areas would remain on the property.

CTARNG soldiers, who are currently training at the Westbrook Armory, would train at the PRC one weekend per month and two weeks per year of duty. Between 150 and 175 CTARNG soldiers would occupy the PRC during those times. In addition, approximately five full-time staff would be on site for day-to-day PRC operations. Over drill weekends, approximately 30 to 40 military vehicles would move to and from the PRC along local/regional roadways.

The PRC would support the training, administrative, and logistical requirements of the CTARNG. The PRC would include an assembly hall and equipment storage space. Larger, field-based training events and weapons qualifications for PRC members would occur at other existing CTARNG properties, such as the East Haven Rifle Range and Stones Military Reservation in East Lyme, Connecticut. Housing for soldiers would not be provided at the PRC. Overnight accommodation would be provided at Camp Nett in Niantic, Connecticut; Fort Dix in Burlington County, New Jersey; or Fort Devens in Devens, Massachusetts (52 miles, 238 miles, and 55 miles from the PRC site, respectively).

2.3 Alternatives Considered

NEPA, CEQ regulations, and 32 CFR Part 651 require that all reasonable alternatives be explored and objectively evaluated to determine if they meet the purpose and need of the proposed action. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons CTARNG eliminating them.

2.3.1 *Alternatives Development*

CTARNG developed the following screening criteria to evaluate the potential alternatives for constructing the PRC:

a. Does the alternative meet the purpose and need of the Proposed Action?
b. Does the alternative comply with all appropriate State and Federal regulations (including DoD ATFP standards)?
c. Does the alternative result in significant adverse environmental impacts (i.e. significant vegetation clearing, visual impacts, grading, etc.)?

2.3.1.1 *Alternative 2 – Western Building and Split POV Parking*

Alternative 2 includes constructing Readiness Center with a 0.50-acre footprint on the west side of the property, 0.90 acres of ORG parking on the northeast side of the property, and 1.11 acres of POV parking (divided into 0.54 acres towards the north of the property and 0.57 acres towards the south of the property), for a total building and parking lot disturbance of 2.51 acres (Figure 2.2). Alternative 2 allows adequate space on-site for a 50-foot ATFP buffer around the Readiness Center. This alternative would result in 0.81 acres of permanent impact to 100-foot wetland buffers. Of this, 0.45 acres are within the existing disturbed wetland buffer area and 0.36 acres would be new wetland buffer disturbance. Alternative 2 would require clearing of approximately 1.31 acres of wooded areas.

Alternative 2 includes a portion of the PRC building being located within wetland buffers and would require approximately 0.50 acres more clearing than the Proposed Action; therefore, this alternative was eliminated from further evaluation.

2.3.1.2 *Alternative 3 – Western Building and Combined POV Parking*

Alternative 3 includes constructing a Readiness Center with 0.58-acre footprint on the west side of the property, 1.11 acres of POV parking towards the north end of the property, and 0.90 acres of ORG parking on the northeast side of the property, for a total building and parking lot disturbance of 2.59 acres (Figure 2.3). Alternative 3 allows adequate space on-site for a 50-foot ATFP buffer around the Readiness Center. Alternative 3 would require 0.31 acres of 100-foot wetlands disturbance. Of this, 0.30 acres are within the existing disturbed wetland buffer area and 0.01 acres would be new wetland buffer disturbance. Alternative 3 would require clearing of approximately 0.47 acres of wooded areas.

Alternative 3 locates all ORG parking in the northeastern portion of the property instead of in the southwestern portion of the property as included under the Proposed Action. To accommodate the northeastern ORG parking lot, the Readiness Center must be moved further to the southwest corner of the property and closer to adjoining properties and Route 44.

Alternative 3 locates the PRC building in a location that will require additional grading and building design considerations due to existing topography when compared to the Proposed Action. It also places the building adjacent to Putnam Road (Route 44), which could require additional design and/or landscaping considerations due to visibility when compared to the Proposed Action. Therefore, this alternative was eliminated from further evaluation.

2.3.1.3 *Alternative 4 – Central Building and Direct Wetland Impact*

Alternative 4 includes constructing a Readiness Center with a 0.65-acre footprint in the central portion of the property, 0.77 acres of POV parking in the western portion of the property, and 1.08 acres of ORG parking in the southeastern portion of the property, for a total building and parking lot disturbance of 2.50 acres (Figure 2.4). This alternative's layout would accommodate a 50-foot ATFP buffer around the Readiness Center. However, Alternative 4's Readiness Center and ORG parking locations would result in approximately 0.74 acres of direct wetland impacts and approximately 2.60 acres of wetland buffer impacts. Of this, 0.28 acres are within the existing disturbed wetland buffer area and 2.32 acres would be new wetland buffer disturbance. Alternative 4 would require clearing of approximately 4.57 acres of wooded areas.

Alternative 4's direct wetland impacts and wetland buffer impacts result in substantial adverse environmental impacts. Therefore, this alternative was eliminated from further evaluation.

2.3.1.4 *Alternative 5 – Alternative Location*

Alternative 5 includes locating the PRC on a different property. CTARNG obtained the subject site in Putnam, Connecticut through the State of Connecticut's Surplus Property Process. No other locations in northeast Connecticut have been considered due to the lack of suitable State surplus land meeting CTARNG's need to provide support facilities in northeastern Connecticut. The CTARNG did not consider purchasing private land. The Federal Government will not pay for land acquisition and the State of Connecticut budget is insufficient to do so.

CTARNG also considered building a readiness center on Stone's Ranch Military Reservation in East Lyme, Connecticut, but that site is located in the southeast corner of the state, approximately 50 miles from the site of the Proposed Action (Figure 2.5), and would not meet the need to establish a CTARNG presence in northeast Connecticut. Therefore, this alternative was eliminated from further evaluation.

2.3.1.5 *No Action*

The No Action Alternative serves as the baseline against which to compare the effects of the other alternatives carried forward for analysis even though it would not satisfy the purpose and need for the

Proposed Action. Under the No Action Alternative, CTARNG would not construct a Readiness Center in northeastern Connecticut. The CTARNG would continue to function without a facility in Windham County and vicinity. CTARNG would not be incompliance with National Guard Pamphlet 415-12 (NGB 2015).

2.3.2 *Alternatives Eliminated from Further Consideration*

CTARNG eliminated the following alternatives from further consideration. They will not be analyzed in the EA's Environmental Consequences section because one or more of the screening criteria identified in Section 2.3.1 was not satisfied:

- Alternative 2 (Western Building and Split POV Parking) was eliminated due to screening criteria c.: adverse environmental impacts due to additional clearing requirements.
- Alternative 3 (Western Building and Combined POV Parking) was eliminated due to screening criteria c.: adverse environmental impacts due to grading needs and visual impact.
- Alternative 4 (Central Building and Direct Wetland Impact) was eliminated due to screening criteria c.: significant adverse environmental impacts to the wetland.
- Alternative 5 (Alternative Location) was eliminated due to screening criteria a.: the project's purpose and need was not satisfied since CTARNG's presence would not be established in northeast Connecticut.

3.0 AFFECTED ENVIRONMENT

This section describes all the resource areas that could be directly or indirectly affected by the Proposed Action in the short and long term. The CTARNG reviewed available information, reports, and studies to identify the resource areas that would be affected by the construction and operation of the PRC.

3.1 Location Description

The PRC property is a 19.67-acre irregularly shaped parcel located along Pomfret Road (Route 44), generally to the west of I-395, in the Northeast Hills ecoregion and in the western portion of the town of Putnam, in Windham County, Connecticut. The property is located approximately 0.25 miles southwest of the Quinebaug River and consists of several large paved parking areas connected by driveways, two DDS buildings formerly associated with the John N. Dempsey Center, vacant areas where additional DDS buildings were demolished in 2019, 9.83 acres of wooded areas. (See Figure 1).

The Northeast Hills ecoregion typically experiences 45 inches of precipitation per year (Dowhan and Craig 1976). Average annual snowfall is approximately 50 inches. Normal temperatures range from 26 degrees Fahrenheit in the winter (16º F normal minimum) to 69 degrees Fahrenheit in the summer (82º F normal maximum), creating an average year-round temperature of approximately 47 degrees Fahrenheit. With an average relative humidity of 55 to 70 percent, the climate is relatively humid throughout the year with considerable seasonality in terms of temperature.

3.2 Land Use

For land use, the ROI considered for the Proposed Action was the immediate project area and areas within the immediate vicinity of the site, generally within 0.25 miles of the site.

The PRC property is in a low-density residential and commercial area of Putnam, Connecticut; much of the nearby land area is undeveloped. The property is zoned as a medical/office development district and has been used for similar government/institutional development for decades. According to the Town of Putnam Tax Assessor, the property is owned by the State of Connecticut. The property is largely undeveloped, with DDS buildings located in its northern portion and vacant areas where additional DDS buildings (demolished in 2019) once stood. The remaining portion of the property supports a mix of secondary woodland growth, scrub growth, and open areas. Adjacent land uses include single-family residences, professional and medical offices, a drug and alcohol treatment center, a probate court, and the Day Kimball Hospital.

3.3 Air Quality

For air quality, the ROI considered for the Proposed Action was the immediate project, areas within the vicinity of the site (generally within 0.25 miles), and the Town of Putnam.

Air quality is a measure of the amount and distribution of potentially harmful pollutants in ambient air within a specific area. The CAA mandates the USEPA set National Ambient Air Quality Standards (NAAQS) for six specific potentially harmful pollutants, otherwise known as criteria pollutants. NAAQS are provided for: carbon monoxide; lead; nitrogen oxides; ozone; sulfur dioxide; and particulate matter, divided into two size classes of 1) aerodynamic size less than or equal to 10 micrometers, and 2) aerodynamic size less than or equal to 2.5 micrometers. According to DEEP, the primary regulatory authority for air quality in Connecticut, the Putnam area is in attainment for all NAAQS (DEEP 2020).

Sensitive receptors near the PRC property include the Day Kimball Hospital and associated buildings, Priority Family Healthcare, Community Health Resources – Milestone, and Northeastern Asthma and Allergy Associates. None of the criteria pollutants to be emitted from the PRC, when combined with existing background pollutant levels, is expected to result in degradations to air quality in the surrounding area.

3.3.1 *GHG/Climate Change and Social Cost*

The Army issued a policy, *Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in Army National Environmental Policy Act Reviews* (2021) providing guidance on the inclusion of GHG emissions and Climate Change, as well as Social Costs, as part of the environmental baseline for NEPA analyses prepared in accordance with 32 CFR 651, Environmental Analysis of Army Actions.

Greenhouse gases (GHGs) are compounds that may contribute to accelerated climate change by altering the thermodynamic properties of the earth's atmosphere. GHGs consist of carbon dioxide (CO2), methane, nitrous oxide, and fluorinated gases (USEPA 2016). Under the USEPA Mandatory Reporting Rule, facilities that emit 25,000 metric tons or more per year of carbon dioxide equivalent (CO2e) emissions must submit annual reports to the USEPA.

This EA looks at GHG emissions as a category of air emissions. It also looks at issues of temperature and precipitation trends (climate change). This EA identifies the GHG emissions of the Proposed Action, including offsets and any carbon sequestration loss, and compares this to state, and national emissions.

Currently, the Westbrook Armory, which houses the unit that will occupy the PRC, records 12 metric tons per year of CO2e (see Appendix B "GREENHOUSE GAS EMISSIONS DATA"). The Westbrook Armory will close when the construction of the PRC is complete.

The proposed action is located in Windham County, where the average high temperature is 82°F (27.8 degrees Celsius (°C)) in the hottest month (July), and its average low temperature is 17°F (-8.3°C) in the coldest month (January). Windham County has average annual precipitation of 48.42 inches (122.99 centimeters) per year. The wettest month of the year is October with an average rainfall of 4.45 inches (11.3 centimeters) (U.S. Climate Data 2021).

The climate of Connecticut is changing. The state has warmed two to three degrees (F) in the last century. Throughout the north-eastern United States, spring is arriving earlier and bringing more precipitation, heavy rainstorms are more frequent, and summers are hotter and drier. Sea level is rising, and severe storms increasingly cause floods that damage property and infrastructure. In the coming decades, changing the climate is likely to increase flooding, harm ecosystems, disrupt farming, and increase some risks to human health (USEPA 2016).

3.4 Noise

For noise, the ROI considered for the Proposed Action was the immediate project area and areas within the immediate vicinity of the site, generally within 0.25 miles of the site.

The property proposed for development of the PRC contains few noise sources, stationary or mobile, since it is mostly undeveloped. The Day Kimball Hospital, located at 320 Pomfret Street, is a sensitive receptor located 0.1 miles to the east of the proposed activity. The closest residence is located approximately 0.15 miles from the PRC property.

3.5 Geology, Topography, and Soils

For geology, topography, and soils, the ROI considered for the Proposed Action was the immediate project area and areas within the immediate vicinity of the site, generally within 0.25 miles of the site, especially areas between the site and Quinebaug River.

Regional topography in the vicinity of the property slopes eastward toward the Quinebaug River as shown on a 2018 plan entitled ""Existing Conditions Map - State of Connecticut, John Dempsey Regional Center, 378 Pomfret Street (Route 44), Putnam, Connecticut", prepared by BL Companies (BL

Companies 2018). The property slopes substantially to the east-northeast with elevations ranging from approximately 435 feet to 340 feet above mean sea level.

Bedrock underlying the property varies but is primarily Hebron Gneiss, derived from granite, with an interlayered dark-gray schist and greenish-gray, and fine to medium-grained gneiss. The southeasternmost portion of the property is mapped as Canterbury Gneiss, while the northeastern portion of the property is mapped as Taconic Hill Formation, consisting of gneiss and schist. Unconsolidated sediments overlying bedrock are mapped as till or thick till. Cores taken along Pomfret Street in the vicinity of the property have revealed 45 to 87 feet of till over the bedrock.

While the soils of the region can be broadly classified as Gray-Brown Podzolic, the surficial soils at the property are primarily Charlton-Hollis, a well-drained fine sandy loam found on gently sloping to steep hill slopes and ridges of glacial till uplands. The soil samples tested during the development of this EA contain volatile organic compounds (VOCs), extractable total petroleum hydrocarbons (ETPH), and polycyclic aromatic hydrocarbons (PAH) below laboratory reporting limits. Results of the metals analysis in the soil (from within the developed portion of the property) revealed detections of arsenic, barium, chromium, copper, lead, nickel, vanadium, and zinc at typical background concentrations.

3.6 Water Resources

For water resources, the ROI considered for the Proposed Action was the immediate project area and areas within 0.25 miles of the site, particularly areas between the site and the Quinebaug River.

The PRC property is in an area identified by the DEEP as groundwater Class GA, indicating the groundwater is suitable for direct human consumption without pretreatment. Class GA groundwater is designated for use as drinking water supplies for existing private and potential public or private developments. Based on regional topography, shallow groundwater is presumed to flow generally to the east-northeast. Based on Federal Emergency Management Agency (FEMA) mapping, no special flood hazard areas are located on or in the vicinity of the PRC property; therefore, the PRC would cause no direct or indirect impacts to or within mapped floodplains. The site is not located within a coastal zone.

The nearest surface waterbody, an unnamed ephemeral tributary to the Quinebaug River, is located just beyond the southeastern property boundary. The Quinebaug River flows generally northwest to southeast approximately 0.25 miles northeast of the property. The unnamed tributary has a surface-water quality classification of A, with designated uses including habitat for fish and other aquatic life and wildlife, potential drinking water supplies, recreation, navigation, and industrial and agricultural water supplies.

The Quinebaug River has a water quality classification of B which may make it suitable for certain fish and wildlife habitat, certain recreational activities, agricultural and industrial supply, and navigation.

The property contains a total of approximately 0.98 acres of delineated inland wetlands, as shown in Figure 1. The majority of these wetlands (approximately 0.95 acres) are located in the central portion of the property, generally running from northwest to southeast in a linear fashion. Approximately 0.03 acres of wetlands lie in the southeast corner of the property, associated with other wetlands located off-site. Two small, isolated wetlands lie to the north of the site. The PRC site includes approximately 6.42 acres of 100-foot wetland buffer areas (BL Companies 2018).

Buildings, paved areas, yards, and other facilities associated with the former John N. Dempsey Center facilities (a portion of which were demolished in 2019), covered approximately 6.20 acres of the property, including 1.27 acres of existing disturbance within 100-foot wetland buffers.

3.7 Biological Resources

For biological resources, the ROI considered for the Proposed Action was the immediate project area and (for ecoregion characterization) areas within 0.25 miles of the site.

The site lies within the Northeast Hills ecoregion, the vegetation of which is dominated by various oak and hickory species, as well as hemlock (*Tsuga*), cedar (*Juniperus*), and white pine (*Pinus*). Disturbed or open areas commonly contain thick shrubs, vines, and briers. Common animals of the woodland and open areas of the region include deer (*Cervidae*), cottontail rabbit (*Sylvilagus*), red fox (*Vulpes vulpes*), opossum (*Didelphimorphia*), squirrels (*Sciuridae*), skunk (*Mephitis mephitis*), chipmunk (*Marmotini*), ruffed grouse (*Bonasa umbellus*), woodcock (*Scolopax*), thrushes (*Turdidae*), woodpeckers (*Picidae*), bobwhite quail (*Colinus virginianus*), pheasant (*Phasianus colchicus*), meadowlarks (*Sturnella*), crow (*Corvus*), field sparrow (*Spizella pusilla*) and other song birds, and migratory waterfowl.

At least three species of bat, including big brown bat (*Eptesicus fuscus*), Eastern red bat (*Lasiurus borealis*), and Hoary bat (*Lasiurus cinereus*) have been detected and confirmed on the PRC property through manual vetting by DEEP. The Hoary bat is a less-common species. Based on the high activity levels, DEEP has determined that the subject property and the surrounding area provide suitable habitat and adequate forage for these species. DEEP did not detect any federally listed species at the PRC property. According to the DEEP National Diversity Database for Putnam, Connecticut (June 2020 data), the PRC property is outside any designated State and Federally Listed Species and Significant Natural Community areas.

The USFWS Information, Planning, and Conservation System (IPaC) (USFWS, 2020) online tool was accessed on November 17, 2020, and the results from the IPaC are included in Appendix A. The IPaC review identified the following federally endangered species that may be present within the project area: Northern Long-eared bat (*Myotis septentrionalis*) (NLEB). The IPaC review did not identify any critical habitat within the project area. Per the DEEP National Diversity Database, there are no known NLEB maternity roost sites within 150' of the PRC site, and no known bat hibernacula within 0.25 mile of the of the PRC site.

The IPaC review results included four migratory birds of particular concern either because they occur on the USFWS Birds of Conservation Concern list or warrant special attention within the project location: Bald Eagle (*Haliaeetus leucocephalus),* Bobolink (*Dolichonyx oryzivorus),* Rusty Blackbird (*Euphagus carolinus)*, and Wood Thrush (*Hylocichla mustelina).* These migratory birds are Federally protected by the Migratory Bird Treaty Act (MBTA) and may forage, nest, and migrate through the project area. Although no longer protected under the federal Endangered Species Act, the bald eagle is protected under the federal Migratory Bird Treaty Act and the federal Bald and Golden Eagle Protection Act.

Due to, at least, the results of the IPaC review, both Executive Order 13186, "Responsibilities of Federal Agencies to Protect Migratory Birds" (EO 13186) and a 2014 "Memorandum of Understanding Between the U.S. Department of Defense and the U.S. Fish and Wildlife Service to Promote the Conservation of Migratory Birds" (2014 MOU) are relevant to the project.

3.8 Cultural Resources

For cultural resources, the Area of Potential Effects (APE) for the Proposed Action was the immediate project area.

Cultural resources are historic properties as defined by the NHPA, cultural items as defined by the NAGPRA, archaeological resources as defined by the Archaeological Resources Protection Act, sacred sites as defined by EO 13007 to which access is afforded under the American Indian Religious Freedom Act, and collections and associated records as defined by 36 CFR 79. NEPA requires consideration of "important historic, cultural, and natural aspects of our natural heritage." Consideration of cultural resources under NEPA includes the necessity to independently comply with the applicable procedures and requirements of other Federal and State laws, regulations, EOs, Presidential Memoranda, and ARNG guidance.

The NHPA of 1966, as amended (Public Law 89-665; 54 USC §300101 et seq.), establishes the policy of the Federal government to provide leadership in the preservation of historic properties and administer

federally owned or controlled historic properties. Section 106 of the NHPA (54 USC §306108) requires Federal agencies to consider the effect an undertaking may have on historic properties; its implementing regulations, 36 CFR Part 800, describe the procedures for identifying and evaluating historic properties; assessing the effects of Federal actions on historic properties; and consulting to avoid, reduce, or minimize adverse effects. The Proposed Action is a Federal undertaking as defined by 36 CFR §800.3, and the CTARNG is required to comply with Section 106 of the NHPA.

The CTARNG consulted with federally recognized Native American tribes as required under *DoD Interactions with Federally Recognized Tribes*, DoD Instruction 4710.02, dated September 24, 2018. The CTARNG contacted the Mohegan Tribe of Indians of Connecticut and the Mashantucket Pequot Indian Tribe. Neither tribe has identified any sacred, religious, cultural, or traditional resources that may be affected by the Proposed Action. Copies of the tribal correspondence letters are included in Appendix A.

3.9 Socioeconomics

For socioeconomics, the ROI considered for the Proposed Action was primarily the Town of Putnam, and to a lesser extent, Windham County.

The property's existing DDS buildings are owned by the State of Connecticut, which is exempt from federal, state, and local property tax. The proposed PRC would be constructed on a portion of this property; the property would continue to be, and the PRC facility would also be, exempt from federal, state, and local property tax.

The Day Kimball Hospital and associated buildings, Priority Family Healthcare, Community Health Resources – Milestone, and Northeastern Asthma and Allergy Associates are located on parcels adjacent to the PRC property. There are no nearby recreation facilities and the closest school to the PRC property is the Putnam Science Academy, located approximately one mile north of the property along Route 44. The nearest shops, services, and restaurants are located along Main Street in downtown Putnam, Connecticut, approximately 1.2 miles to the northeast.

United States Census data lists the Town of Putnam as having approximately 9,389 persons, with 19 percent of the population age 65 or older, as of July 1, 2019. The listed median household income, as of that date, was $59,753, with a per capita income of $32,395 and a poverty rate of 8.8 percent.

3.10 Environmental Justice

For environmental justice, the ROI considered for the Proposed Action was primarily the Town of Putnam, and to a lesser extent, Windham County.

EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (1994), requires Federal agencies to identify and address disproportionate adverse effects of their programs, policies, and activities on minority and low-income populations. Effective January 1, 2009, Section 22a-20a of the Connecticut General Statutes (CGS) (formerly Public Act 08-94), along with the DEEP's *Environmental Equity Policy*, effective December 17, 1993, requires applicants seeking a permit for a new or expanded "affecting facility" proposed to be located in an "environmental justice community," to file an Environmental Justice Public Participation Plan with and receive approval from the DEEP prior to filing any application for such permit. As explained in Section 4.10.1, CTARNG will not need to file an Environmental Justice Public Participation Plan with DEEP.

3.11 Infrastructure

For infrastructure, the ROI considered for the Proposed Action was the immediate project area, and surrounding areas within the service area of affected infrastructure.

The property is adjacent to and serviced by Pomfret Street (Route 44), a two-lane state highway owned and maintained by the Connecticut Department of Transportation (CDOT), and is approximately 2.5 miles from Interstate Route 395, a multi-lane limited access highway. CDOT's most recent available Average Annual Daily Traffic (AADT) volume for Pomfret Street is 5,200 vehicles for the west portion of the property and 5,500 vehicles for the eastern portion of the property.

The property is connected to municipal water and sewer systems operated by the Putnam Water and Sewer Department. No drinking water wells are located on the property. Existing buildings on the property are heated by fuel oil. The property is serviced by overhead electric and telecommunications lines along Putnam Road (Route 44).

No structures were present on the property until approximately 1930 when a now-demolished house in the western portion of the property was built. The John N. Dempsey Center and its associated infrastructure was built around 1964; all but two associated buildings were demolished in 2019. The remaining buildings continue to be used by DDS as the CT DDS Putnam Satellite Office.

3.12 Hazardous and Toxic Materials/Waste (HTMW)

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (through either physical or chemical reactions) to human health or the environment. Regulated hazardous substances are identified through a number of Federal laws and regulations. The most comprehensive list, contained in 40 CFR Part 302, identifies substance quantities that when released to the environment, require notification to a Federal government agency. Hazardous wastes, defined in 40

CFR Part 261.3, are considered hazardous substances. Generally, hazardous wastes are discarded materials (solids or liquids) not otherwise excluded by 40 CFR Part 261.4 that exhibit a hazardous characteristic (i.e., ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR Part 261. Petroleum products are specifically exempted from 40 CFR Part 302, but some are also generally considered hazardous substances due to their physical characteristics (especially fuel products), and their ability to impair natural resources.

Phase I and II Environmental Site Assessments (ESAs) (Leggette, Brashears & Graham, Inc. 2017 and 2018) conducted for the site provide Environmental Condition of Property (ECOP) documentation for the proposed activity. A pre-construction assessment (PCA) will be conducted within 180 days of the start of construction to update the ECOP with current conditions. When conducting the additional assessment prior to construction, all applicable requirements in *Army Regulation (AR) 200-1* and the Army National Guard 2011 Environmental Condition of Property Handbook, *The ARNG's ECOP Process Handbook* will be followed.

Based on information gathered for the Phase I ESA, the property does not fit the definition of an "Establishment", as defined in the Connecticut General Statutes. The property is, therefore, not subject to provisions of the Connecticut Transfer Act. However, the Phase I ESA concluded that the Subject Property can be classified as a Category II Site property for PCA. A Category II Site is one where there is no known contamination, but there remains some potential that contamination may be encountered during construction. Therefore, and based on results of the Phase I ESA, geotechnical borings were completed at three recognized environmental conditions (RECs) on the property to test for contamination as part of the Phase II assessment. Based on the results of these borings, the Phase II Site Assessment concluded that no significant contamination was detected (Leggette, Brashears & Graham, Inc. 2018). There is no reason to suspect contamination will be encountered during construction. The remainder of the property did not undergo geotechnical work, so while there is no known contamination, the potential to encounter contamination during construction still exists.

4.0 ENVIRONMENTAL CONSEQUENCES

This section describes the environmental consequences that could be directly or indirectly affected by the Proposed Action in the short and long term. Effects of the Proposed Action on the resource areas presented in Section 3 are discussed, along with the effects of the No Action Alternative and proposed Best Management Practices for each resource area.

4.1 Location Description

This section is intentionally left blank. See description in Section 3.1.

4.2 Land Use

4.2.1 *Effects of the Proposed Action*

Construction of the PRC would require conversion of the site from a medical care/office development to a Military Installation. Parking areas, former building locations, and other facilities formerly associated with the John N. Dempsey Center would be replaced with a readiness center building, parking areas, and other facilities associated with the PRC. The area of disturbance would generally align with the existing area of disturbance on the site. Approximately 0.81 acres of clearing would be required, primarily to allow for grading. Most of the southeastern portion of the property would not be altered from its current land use (undeveloped/wooded). The CTARNG would maintain and operate the PRC while the State of Connecticut would continue to own the land.

Operation of the of PRC, including the activities conducted there, would be consistent with applicable regional and local land use plans, including the Town of Putnam's Plan of Conservation and Development (POCD), and the current zoning of surrounding properties. PRC operations would not restrict the use of adjacent properties. Field-based training events and weapons qualifications for PRC members would occur at other existing CTARNG properties.

4.2.2 *Effects of the No Action Alternative*

No changes in land use would occur under the No Action Alternative because the PRC would not be constructed.

4.2.3 *Best Management Practices (BMPs)*

No NEPA mitigation is required to reduce potential adverse effects from the Proposed Action on land use. The operation of the proposed PRC would be compatible with published plans and future development proposed in the vicinity of the new readiness center. While not required for mitigation, the final site and

construction plan for the PRC, to be finalized after this EA, will address DEEP's recommendations related to low impact development received during scoping.

4.3 Air Quality

4.3.1 *Effects of the Proposed Action*

Short term and temporary air quality impacts associated with mobile-source emissions and fugitive dust would occur during construction of the Proposed Action. Dust control will be monitored to minimize effects on local air quality. Specific BMPs for dust control are listed in Section 4.3.3. Emissions related to construction activities would be below the de minimis level.

Once constructed, long term, minimal increases in air emissions would result from operation of the HVAC system and vehicle operations on-site. Use of newer mechanical systems proposed and continuing improvements in diesel fuel formulas would support minimal increases in air emissions over time. All roads and parking areas would be paved to reduce dust emissions. CTARNG will be required to submit to DEEP a *Permit Application for Stationary Sources of Air Pollution - New Source Review*. This permit will be obtained by CTARNG prior to the start of construction.

4.3.3.1 Greenhouse Gas (GHG) Emissions Analysis

Using the USEPA's Simplified Greenhouse Gas Emissions calculator, [https://www.epa.gov/climateleadership/simplified-ghg-emissions-calculator] estimated peak GHG emissions from construction and operation of the Proposed Action would be 74 metric tons per year of CO2e (see Appendix B "GREENHOUSE GAS EMISSIONS DATA"). Due to the closure of the Westbrook Armory (which records 12 metric tons per year of CO2e) upon construction of the PRC, the Proposed Action would result in a net increase of 62 metric tons per year of CO2e. Compared to state, and national emissions, the Proposed Action would increase GHG emissions by 0.0013% and 0.00000095%, respectively (CT DEEP 2020 and USEPA 2019).

The Proposed Action will result in a non-significant increase in state and national GHG emissions. To assist with both protection against the effects of predicted climate change and minimization of GHG emission increases, the PRC will be designed to meet Leadership in Energy and Environmental Design (LEED) Silver level. LEED includes a framework for highly efficient green buildings; green buildings reduce the impact buildings have on contributing to climate change (USGBC 2021). The site design includes biofiltration swales, rain gardens, and an underground stormwater detention system, all of which will assist with minimizing stormwater runoff. The site design also includes electric car charging

stations, which will encourage use of electric vehicles that produce fewer GHG emissions when compared to gasoline and diesel-powered vehicles.

USEPA and other federal agencies use estimates of the social cost of carbon (SC-CO_2) to determine a value of the climate impacts of rulemakings. The SC-CO_2 is a measure, in dollars, of the long-term damage done by a ton of carbon dioxide (CO2) emissions in a given year. This dollar figure also represents the value of damages avoided for a small emission reduction (i.e., the benefit of a CO_2 reduction). The $37 per ton of CO2 has been adjusted for inflation to $51 per ton (IWG 2021). Therefore, the social cost for the proposed Readiness Center would be $3700.00.

4.3.2 *Effects of the No Action Alternative*

No changes in localized air quality would occur under the No Action Alternative because the PRC would not be constructed. This alternative involves maintaining existing environmental conditions through current operational controls at all CTARNG facilities. Because the number and type of activities would remain consistent with current levels under the No Action Alternative, CTARNG would continue its current use of fuels for mobile and temporary sources, resulting in minor impacts due to similar levels of emissions of both criteria pollutants and GHGs (see Appendix B).

4.3.3 *Best Management Practices*

BMPs to limit the minor impacts to air quality during construction include not allowing construction vehicles and equipment to idle for an extended period of time, enacting a reduced speed limit for construction equipment to follow when on unpaved surfaces, repairing and servicing construction vehicles and equipment on a regular basis to prevent excess emissions, and use of appropriate dust suppression methods (including application of water, soil stabilizers, or vegetation).

4.4 Noise

4.4.1 *Effects of the Proposed Action*

Short term, minor less than significant adverse noise impacts would occur during construction of the Proposed Action. On a typical day, construction will take place between 0800 and 1700 hours, eliminating the potential of disruption due to noise at night. These construction hours would occur outside of the local Putnam noise restrictions hours of 2300 and 0700 (Putnam 2014). Construction noise would be intermittent and localized and would result from the use of construction machinery (e.g. bulldozers, backhoes, dump trucks, graders and track-hoes). Day Kimball Hospital, the closest sensitive receptor near the property, has a distance of approximately 450 feet from the anticipated construction area and the

presence of a vegetated buffer (deciduous and evergreen trees and shrubs) between the hospital and the Project should reduce the effects of noise generated during construction.

During operation of the PRC, long term, minor increases in existing noise levels would be expected due to its occupation by CTARNG. Increased traffic to the area would cause an occasional minor increase in noise, but impacts would not be significant. Field-based training events and weapons qualifications for PRC members, and vehicle maintenance, would not occur at this CTARNG property.

4.4.2 *Effects of the No Action Alternative*

No changes in noise would occur under the No Action Alternative because the PRC would not be constructed. No impacts related to construction or operational noise at the property would result from the No Action Alternative.

4.4.3 *Best Management Practices*

Efforts to reduce minor construction noise will include turning off noise-generating equipment when not in use, not allowing construction equipment to idle for an extended period of time and locating stationary noise-generating equipment as far away from sensitive receptors as possible. Additionally, the existing wooded buffer will be maintained on portions of the property to reduce short-term and long-term noise impacts.

4.5 Geology, Topography, and Soils

4.5.1 *Effects of the Proposed Action*

Minimal impacts to soils are expected during construction from grading of the property where the PRC will be built. Soil disturbance could result in increased erosion potential from loss of ground cover and exposure of bare soils to precipitation and stormwater runoff.

During operation of the PRC, it is not anticipated that training or other activities to be performed by the CTARNG will result in impacts to geology, topography, or soils. Field-based training events and weapons qualifications for PRC members will not occur at this CTARNG property.

4.5.2 *Effects of the No Action Alternative*

No impacts to geology, topography, or soils would occur under the No Action Alternative because the PRC would not be constructed. No impacts related to geology, topography, or soils would result from the No Action Alternative.

4.5.3 *Best Management Practices*

Based on soil sampling results, no special soil management methods or practices are required for the construction work beyond normal soil stockpile management associated with applicable Occupational Safety and Health Administration (OSHA) and DEEP regulations. More than one acre of land will be disturbed to construct the proposed facility requiring CTARNG to obtain coverage under the DEEP "General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities" and comply with the requirements of that permit. Temporary sedimentation and erosion controls would be installed and maintained during construction in compliance with permit requirements.

The Preferred Action has been designed to minimize grading on the site, reducing the potential for soil erosion impacts during construction. Long term potential soil erosion impacts during CTARNG activities would be mitigated by replanting or stabilizing the property following construction and avoiding activities in bare or damp areas.

4.6 Water Resources

4.6.1 *Effects of the Proposed Action*

Construction of the Proposed Action would result in no direct wetland impacts (filling of wetlands) but would have 1.15 acres of permanent impacts within the 100-foot wetland buffer regulated by the Putnam Inland Wetlands and Watercourses Commission (PIWWC). Of this, 1.07 acres are within existing disturbed wetland buffer areas and 0.08 acres would be new wetland buffer disturbance.

Construction of the PRC may cause short-term, less than significant impacts to wetlands and the unnamed stream near the property caused by soil erosion and sediments that could be carried by stormwater runoff. Construction of the PRC will not require an Inland Wetlands Permit from the DEEP because no construction will occur within the wetlands and no temporary or permanent alteration of wetlands would occur.

Section 404 of the CWA regulates discharge of dredged or fill material into waters if the United States, including wetlands (USEPA 2020). During construction and operation of the PRC, no discharge of dredged or fill material will occur into the two delineated wetlands on the property, or any other waters of the United States. As a result, CTARNG does not need to apply for a permit under CWA Section 404. The PRC was designed with a focus on avoiding and minimizing impacts to wetlands, streams, and other aquatic resources. Although highly unanticipated, if impacts become unavoidable during construction, proper compensation which includes restoration, establishment or enhancement will be enacted.

Based on the analysis conducted, the need for onsite permanent stormwater management facilities has not been determined. During operation of the PRC, it is not anticipated that training or other activities to be performed by the CTARNG will result in water resource impacts, specifically impacts to the two delineated wetlands. Field-based training events and weapons qualifications for PRC members, and vehicle maintenance, would occur at other existing CTARNG properties.

Overall, construction and operation of the PRC would only result in less than significant adverse impacts.

4.6.2 *Effects of the No Action Alternative*

No impacts to water resources would occur under the No Action Alternative because the PRC would not be constructed. No impacts to water resources would result from the No Action Alternative.

4.6.3 *Best Management Practices*

The identified wetlands in the project area will be protected during construction using silt fence and other applicable best management practices (BMPs), and restabilized following construction. No field-based training events, weapons qualifications, or vehicle maintenance would occur at the site, minimizing the potential for impacts to water resources.

4.7 Biologicial Resources

4.7.1 *Effects of the Proposed Action*

Site clearing and grading would result in less than significant adverse impacts to wildlife, wildlife habitat, and vegetation (collectively, "biological resources") on the property. The majority of the Proposed Action would be constructed on currently disturbed land (i.e., currently developed or cleared). The Proposed Action would result in a total loss of approximately 0.81 acres of wooded areas; approximately 9.73 wooded acres would remain on the site. Existing and contiguous wooded areas on adjacent properties could support use by any wildlife displaced by site clearing and construction. Therefore, any loss of wooded area from the Proposed Action would have less than significant adverse impact on biological resources. No impacts to endangered species or migratory birds are anticipated for construction of the PRC, in compliance with both EO 13186 and the 2014 MOU.

The IPaC review, completed on November 17, 2020 and included in Appendix A, identified that the Northern Long-eared bat (*Myotis septentrionalis*) may be present within the project area. Per the DEEP National Diversity Database, there are no known NLEB maternity roost sites within 150' of the PRC site, and no known bat hibernacula within 0.25 mile of the of the PRC site. The IPaC review did not identify any critical habitat within the project area.

During operation of the PRC, it is not anticipated that training or other activities to be performed by the CTARNG will result in significant impacts to the biological resources on the property. Field-based training events and weapons qualifications for PRC members would not occur on this CTARNG property, leaving biological resources on the PRC site unaffected.

4.7.2 *Effects of the No Action Alternative*

No impacts to biological resources would occur under the No Action Alternative because the PRC would not be constructed. No impacts to biological resources would result from the No Action Alternative.

4.7.3 *Best Management Practices*

Vegetation clearing will be limited to what is needed for construction of the buildings and parking lots shown on the site plans. PRC activities will be conducted on previously disturbed areas of the property to minimize future long-term effects on biological resources.

To minimize impacts to NLEB and migratory birds, ground disturbance and tree clearing will not be performed between June 1 and July 31. Should any bald eagle nests be observed within the project area, the USFWS will be consulted.

CTARNG will comply with both EO 13186 and the 2014 MOU to avoid or minimize impacts on migratory birds to the extent practicable.

4.8 Cultural Resources

4.8.1 *Effects of the Proposed Action*

Background research, previous consultation, and archaeological surveys have been conducted at the proposed PRC site to identify and evaluate historic properties that may be affected by the Proposed Action. A report titled Phase I Archaeological Reconnaissance Survey of the CTARNG Putnam Regional Readiness Center in the Town of Putnam Connecticut, dated September 2018, was prepared by Archaeological Consulting Services (ACS) and included SHPO consultation.

A historic property found on the site, a Craftsman style historic house, was determined to be non-significant by SHPO. SHPO assessed the house and confirmed this non-significant determination in a letter dated June of 2018 which is included in the Phase I Archaeological Reconnaissance Survey. Furthermore, the historic house is not eligible for the National Register of Historic Places. A Notice of Scoping letter was sent to SHPO in April of 2019 and October of 2020. CTARNG received no additional response from SHPO from either scoping process.

Additionally, CTARNG consulted with SHPO regarding the Westbrook Armory, which currently houses the unit that will occupy the PRC, and which will be subject to closure upon completion of the PRC. Based on the results of these consultations, CTARNG has concluded that the Proposed Action would have no effect on historic properties.

Site clearing and grading is required for the Proposed Action. CTARNG has concluded that the Proposed Action would have no effect on historic properties, and no sacred, religious, cultural, or traditional resources that may be affected by the Proposed Action have been identified. No potential effects to cultural resources are anticipated during PRC operations.

4.8.2 *Effects of the No Action Alternative*

Construction and operation of the PRC would not occur if the No Action Alternative was pursued. No impacts to cultural resources would result from the No Action Alternative.

4.8.3 *Best Management Practices*

If unanticipated cultural resources are encountered during construction, Federal, State, and CTARNG protocols will be followed.

4.9 Socioeconomics

4.9.1 *Effects of the Proposed Action*

Short term beneficial socioeconomic effect could be associated with the PRC if the CTARNG selects a local contractor to complete the construction. By selecting a local contractor, CTARNG would provide jobs for local tradespeople. Local businesses outside of the construction industry could also benefit from the construction of the PRC since workers would purchase goods and services (e.g. food, lodging) within the Town of Putnam.

Long term, CTARNG staff purchase goods and services within the Town of Putnam, benefitting local businesses. Additional increased business to Putnam and the surrounding areas would result from soldiers visiting the PRC one weekend each month.

No additional load is expected to be placed on the fire or police departments or medical facilities as a result of implementing the Proposed Action. No adverse impacts to public health and safety are anticipated from construction or operation of the PRC. Furthermore, the Proposed Action will not change how emergency responders would access the CTARNG property. Public access will be restricted to the PRC with the eight-foot high chain link fence around the property.

4.9.2 *Effects of the No Action Alternative*

Under the No Action Alternative, the PRC would not be constructed. No impacts to the local community, businesses, or emergency service would result from the No Action Alternative.

4.9.3 *Best Management Practices*

During contractor selection for construction of the PRC, Federal, State, and CTARNG policies will be followed. No additional socioeconomic BMPs are required.

4.10 Environmental Justice

4.10.1 *Effects of the Proposed Action*

The Town of Putnam is listed by the State of Connecticut as a Distressed Municipality and is therefore considered an environmental justice community. However, the proposed activity is not considered an "affecting facility" under CGS 22a-20a (effective January 1, 2009) or DEEP's Environmental Equity Policy (effective December 17, 1993), meaning CTARNG will not have to file for an Environmental Justice Public Participation Plan. Therefore, and based on the description of the proposed activity in Section 2, CTARNG does not anticipated that the Proposed Action will have a disproportionate adverse effect on minority and/or low- income populations.

4.10.2 *Effects of the No Action Alternative*

Construction and operation of the PRC would not occur if the No Action Alternative was pursued. No impacts to low-income, minority, or LEP communities would occur as a result of the No Action Alternative.

4.10.3 *Best Management Practices*

CTARNG does not anticipated that the Proposed Action will have a disproportionate adverse effect on minority and/or low- income populations. Therefore, no best management practices are required.

4.11 Infrastructure

4.11.1 *Effects of the Proposed Action*

Parking areas, former building locations (now vacant), and other facilities formerly associated with the John N. Dempsey Center would be replaced with a readiness center building, parking areas, and other facilities associated with the PRC. Most of the southeastern portion of the property would not be altered from its current land use (undeveloped/wooded). The combination of building and parking lots for the PRC will result in an increase in impermeable surface area when compared to existing conditions.

The PRC will be designed to meet LEED Silver level. LEED, as the most widely used green building rating system, provides framework for healthy, highly efficient, and cost-saving green buildings (USGBC 2021). The Silver level is the second tier of certification.

The readiness center will utilize the property's existing connections to municipal water and sewer systems. Usage of these systems by the PRC will be less-than significant when compared to those of the former John F. Dempsey Center, as the John F. Dempsey Center had a higher occupancy when it was operated as a residential facility than the PRC will be. Therefore, the effect on these systems is expected to be a net decrease from previous conditions.

During construction and operation of the PRC, minor increase in traffic along Pomfret Street (Route 44) are anticipated. With only one drill weekend each month, the majority of traffic visiting the PRC will be the limited day-to-day staff. Field-based training events and weapons qualifications for PRC members would occur at other existing CTARNG properties. Based on the expected size and usage patterns, and CDOT AADT data for Pomfret Street along the property, any impacts to traffic by the PRC's regular operations are expected to be minor when compared to those of the former John F. Dempsey Center, and in the context of overall existing traffic on Pomfret Street.

4.11.2 *Effects of the No Action Alternative*

No impacts to infrastructure would occur under the No Action Alternative because the PRC would not be constructed. No impacts to infrastructure would result from the No Action Alternative.

4.11.3 *Best Management Practices*

The effects of the Proposed Action and Alternatives are not considered to be above significant levels, so no mitigation measures are needed to reduce the impacts. While not required for mitigation, DEEP recommendations related to low impact development received during the scoping process will be addressed as part of a final site and construction plan for the PRC. The PRC will be designed to meet LEED Silver level.

4.12 Hazardous and Toxic Materials/Waste

4.12.1 *Effects of the Proposed Action*

Short-term, less than significant impacts could occur during the construction phase due to a potential for spill incidents from construction vehicles and equipment. There is also a potential that contamination could be encountered on the property during construction.

Long term impacts may result from the PRC due to hazardous and toxic materials/waste generation. All such types of waste that may be generated by the facility will be handled according to all Federal, State, and local rules. Field-based training events and weapons qualifications for PRC members, and vehicle maintenance, would not occur at this CTARNG property, therefore no associated hazardous or toxic materials/waste generated from these activities would be disposed of at the PRC site.

Overall, construction and operation of the PRC would only result in less than significant impacts, if any impacts are to occur.

4.12.2 *Effects of the No Action Alternative*

Under the No Action Alternative, the PRC would not be constructed. No hazardous and toxic materials/waste would be generated under the No Action Alternative.

4.12.3 *Best Management Practices*

All appropriate protocols for spill incidents will be utilized during demolition and construction. If contamination is encountered during demolition or construction, proper categorization, removal, and disposal methods will be used per applicable state, Federal, and CTARNG requirements.

4.13 Mitigation Measures

No mitigation measures are necessary to reduce adverse effects to less than significant levels. There are a number of BMPs identified in this EA and summarized in the table below. BMPs are necessary to reduce minor adverse effects from the potential generation of hazardous and toxic materials/waste resulting from the Proposed Action.

Table 1: Best Management Practices

Applicable Resource Area	BMP	Section
Noise	Noise-generating equipment will be turned off when not in use.	4.4.3
Noise	Construction will be performed during daytime hours.	4.4.3
Noise	Not allowing construction equipment to idle for an extended period of time.	4.4.3

Noise	Locate stationary noise-generating equipment as far away from sensitive receptors as possible.	4.4.3
Geology, Topography and Soils	Follow OSHA soil stockpile management protocols.	4.5.3
Water Resources	Protect wetlands using silt fence.	4.6.3
Water Resources	Construction activities will not be allowed within 50 feet of delineated wetlands (other than as approved as part of project permitting).	4.6.3
Biological Resources	Clear the minimal amount of vegetation necessary.	4.7.3
Biological Resources	Operation activities will be performed in previously disturbed areas.	4.7.3
Hazardous and Toxic Materials/Waste	Utilize proper disposal methods.	4.12.3

4.14 Cumulative Effects

This section addresses the effects of the Proposed Action in combination with the effects of other past, current and proposed future actions within the vicinity of the PRC. Cumulative effects are defined by the CEQ Regulations in 40 CFR 1508.7 as an "impact on the environmental which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." Cumulative effects are not limited to those from actual proposals but also contain impacts from contemplated or reasonably foreseeable action in the Proposed Action's ROI.

4.14.1 *Cumulative Effects Within the Area*

Reasonable nearby foreseeable activities in the vicinity of the PRC include:

- updates/additions to the Day Kimball Hospital;
- additional residential developments;
- repaving of Route 44 and other surrounding roads; and
- surrounding water or sewer upgrades.

The Town of Putnam POCD guides the land use decisions within the Town of Putnam, which is in turn defines the development of the town (Putnam 2016). Operation of the PRC, including the activities conducted there, will not conflict with the POCD's stated goals and objectives, and, specifically, is consistent with the stated goal to "provide public facilities and services in the town that will continue to meet the applicable social and economic needs of all of Putnam's present and future residents". The PRC will be designed to meet LEED Silver level and will provide redevelopment of an existing developed site, which is consistent with the POCD's stated goals of redeveloping existing land uses before developing raw land and promoting and employing green and sustainable land use development and construction methods, respectively.

Environmental effects such as traffic congestion, air quality impacts, and noise impacts would have temporary, less than significant increases during construction of new developments in the area surrounding the PRC. With any new developments, additional demands are placed on utilities, infrastructure, and services. Additional resources, such as cultural, biological, and natural resources, might also be impacted by future activities in the vicinity of the PRC. Any additional development in the area after the PRC is constructed would need to coordinate with CDOT for traffic and transportation management plans and DEEP for environmental protection practices to implement.

4.14.2 *Cumulative Effects of the Proposed Action*

The Proposed Action would result in the impacts identified in Section 4. These include minimal less than significant adverse impacts to land use, noise, soils, water resources, biological resources, infrastructure, and HTMW. The construction of and activities at the PRC would unlikely foster more than minimal additional development in the local area because most of the personnel's and soldiers' needs would already be met by existing establishments. Therefore, the level of cumulative effects is expected to be low overall and the significance thresholds for each resource area are not expected to be breached.

4.14.3 *Inter-relationship of Cumulative Effects*

Constructing the PRC in Putnam Establishing the PRC has the potential to temporarily incrementally increase traffic congestion along Route 44 and stress on the surrounding transportation infrastructure, especially during monthly training events, and incrementally increase the amount of developed land. Any construction on currently undeveloped land can result in associated biological resource impacts. However, implementation of the Proposed Action is not expected to contribute significantly to the cumulative adverse impacts of any resource area discussed in this EA. Cumulative net positive impacts to the local socio-economic environment to the potential increased spending by workers and visitors are expected to result from the implementation of the Proposed Action.

5.0 COMPARISON OF ALTERNATIVES AND CONCLUSIONS

5.1 Comparison of the Environmental Consequences of the Alternatives

Compared to the eliminated alternatives, the Proposed Action minimizes effects on water resources (i.e. wetlands and wetland buffers), reduces clearing, and allows for a 50-foot ATFP buffer to comply with DoD standards, therefore; it is the preferred alternative for development of the PRC.

The No Action Alternative serves as the baseline from which to compare the potential impacts of the Proposed Action. While the No Action Alternative would not produce any adverse environmental impacts, it would not satisfy the purpose and need for the project.

Table 2: Alternative Comparison Matrix

Technical Resource Area	Proposed Action	No Action Alternative
Land Use	Change the local zoning of this parcel from a medical care/office development to a Military Installation. No long-term land use impacts are anticipated. The Proposed Action would not conflict with regional and local land use plans and zoning.	No impact attributable to this action.
Air Quality	Construction-related emissions; additional vehicular traffic emissions during operations – all within an area in attainment for the NAAQS. Long term, minor increased air emissions would cause occasional, less-than-significant effects on air quality. A minor increase in GHG emissions would result in negligible, adverse indirect impacts to climate change.	No impact attributable to this action.
Noise	Short term, minor noise impacts are expected due to noise generation during demolition and construction activities. Long term, less-than-significant increases would be expected since CTARNG would occupy the property. Long term, minor increased traffic to the area would cause occasional, less-than-significant adverse increases in noise.	No impact attributable to this action.

Geology, Topography, and Soils	Less-than-significant adverse impacts to soils are expected during construction from grading. Loss of ground cover and exposure of bare soils could increase soil disturbance. Since field-based exercises and vehicle maintenance are to occur offsite, long term impacts to geology, topography, and soils are not anticipated.	No impact attributable to this action.
Water Resources	Short-term, less-than-significant impacts to water resources due to the potential for minimal soil erosion and sediments that might be carried by stormwater runoff during construction. Since field-based exercises and vehicle maintenance are to occur offsite, long term impacts to water resources are not anticipated.	No impact attributable to this action.
Biological Resources	Short-term, less-than-significant impacts will result from clearing and grading during construction. The site's wooded areas would be reduced due to the Proposed Action. Since field-based exercises are to occur offsite, long term impacts to biological resources are not anticipated.	No impact attributable to this action.
Socioeconomic	Short term construction job creation and both short term and long-term support of local businesses for goods and services. No other short term or long-term impacts are anticipated.	No impact attributable to this action.
Cultural Resources	No short term or long-term impacts are anticipated.	No impact attributable to this action.
Environmental Justice	No short term or long-term impacts are anticipated.	No impact attributable to this action.
Infrastructure	Less-than-significant adverse impacts due to the minimal increase in impermeable surface areas. The PRC will utilize the existing property's connections to municipal water and sewer systems, electricity, and telecommunications, and make use of existing adjacent public roads.	No impact attributable to this action.

	Short term and long term less-than-significant adverse impacts will result from the increased traffic to the PRC.	
Hazardous and Toxic Materials/Waste	Short term impacts are not anticipated but there is a potential for spills or encountering contamination during construction. Less-than-significant long-term impacts may result from the PRC due to limited hazardous and toxic materials/waste generation.	No impact attributable to this action.

5.2 Conclusion

This EA summarizes the comprehensive evaluation of the existing conditions and environmental consequences of implementing the Proposed Action and Alternatives and the No Action Alternative, as required by the National Environmental Policy Act of 1969.

Based on the findings of this EA, no significant adverse impacts would occur to environmental resources resulting from the Proposed Action. The analysis presented indicates that an EIS is unnecessary for this Proposed Action Alternative and issuance of a FONSI is appropriate.

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8.0 AGENCIES AND INDIVIDUALS CONSULTED

Federal Agencies

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United States Environmental Protection Agency
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United States Army Corps of Engineers
New England District
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United States Department of Agriculture, Natural Resources Conservation Service
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Acting State Conservationist
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Native American Tribe
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13 Crow Hill Road
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Native American Tribe
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Connecticut State Historic Preservation Office
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Connecticut Department of Economic & Community Development
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Connecticut Department of Transportation
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Connecticut Department of Emergency Services and Public Protection
Col. George Battle, Commanding Officer
Division of State Police
1111 Country Club Road
Middletown, CT 06457

Local Agencies

Mayor
Mayor Barney Seney
126 Church Street
Putnam, CT 06260

Planning Commission
Mr. Gerard Cotnoir, Chairman
Putnam Planning Commission
126 Church Street
Putnam, CT 06260

Zoning Commission
Ms. Patricia Hedenberg, Chairwoman
Putnam Zoning Commission
126 Church Street
Putnam, CT 06260

Inland Wetlands Commission
Putnam Inland Wetlands Commission
126 Church Street
Putnam, CT 06260

Library
Putnam Public Library
225 Kennedy Drive
Putnam, CT 06260

FIGURES

Legend

- Existing Building
- 100-Foot Wetland Buffer
- Wetland
- Site Boundary

N

0 100 200 400 Feet

Sources: CTANG, CTDEEP, ESRI

Connecticut Army National Guard
Environmental Assessment for
Proposed Putnam Readiness Center
Putnam, Connecticut

Proposed Site Location

Figure 1

Legend

- Building
- Parking/Driveway
- Area of Disturbance
- 100-Foot Wetland Buffer
- Site Boundary
- Wetland

N

0 100 200 400 Feet

Sources: CTANG, CTDEEP, ESRI

Connecticut Army National Guard
Environmental Assessment for
Proposed Putnam Readiness Center
Putnam, Connecticut

Alternative 1 - Proposed Action

Figure 2.1

Legend

- Building
- Parking
- Area of Disturbance
- 100-Foot Wetland Buffer
- Wetland
- Site Boundary

N

0 100 200 400 Feet

Sources: CTANG, CTDEEP, ESRI

Connecticut Army National Guard
Environmental Assessment for
Proposed Putnam Readiness Center
Putnam, Connecticut

Alternative 2 - Western Building and Split POV Parking

Figure 2.2

Legend

- Building
- Parking
- Area of Disturbance
- 100-Foot Wetland Buffer
- Wetland
- Site Boundary

N

0 100 200 400 Feet

Sources: CTANG, CTDEEP, ESRI

Connecticut Army National Guard
Environmental Assessment for
Proposed Putnam Readiness Center
Putnam, Connecticut

Alternative 3 - Western Building and Combined POV Parking

Figure 2.3

Legend

- Building
- Parking
- Area of Disturbance
- 100-Foot Wetland Buffer
- Wetland
- Site Boundary

N

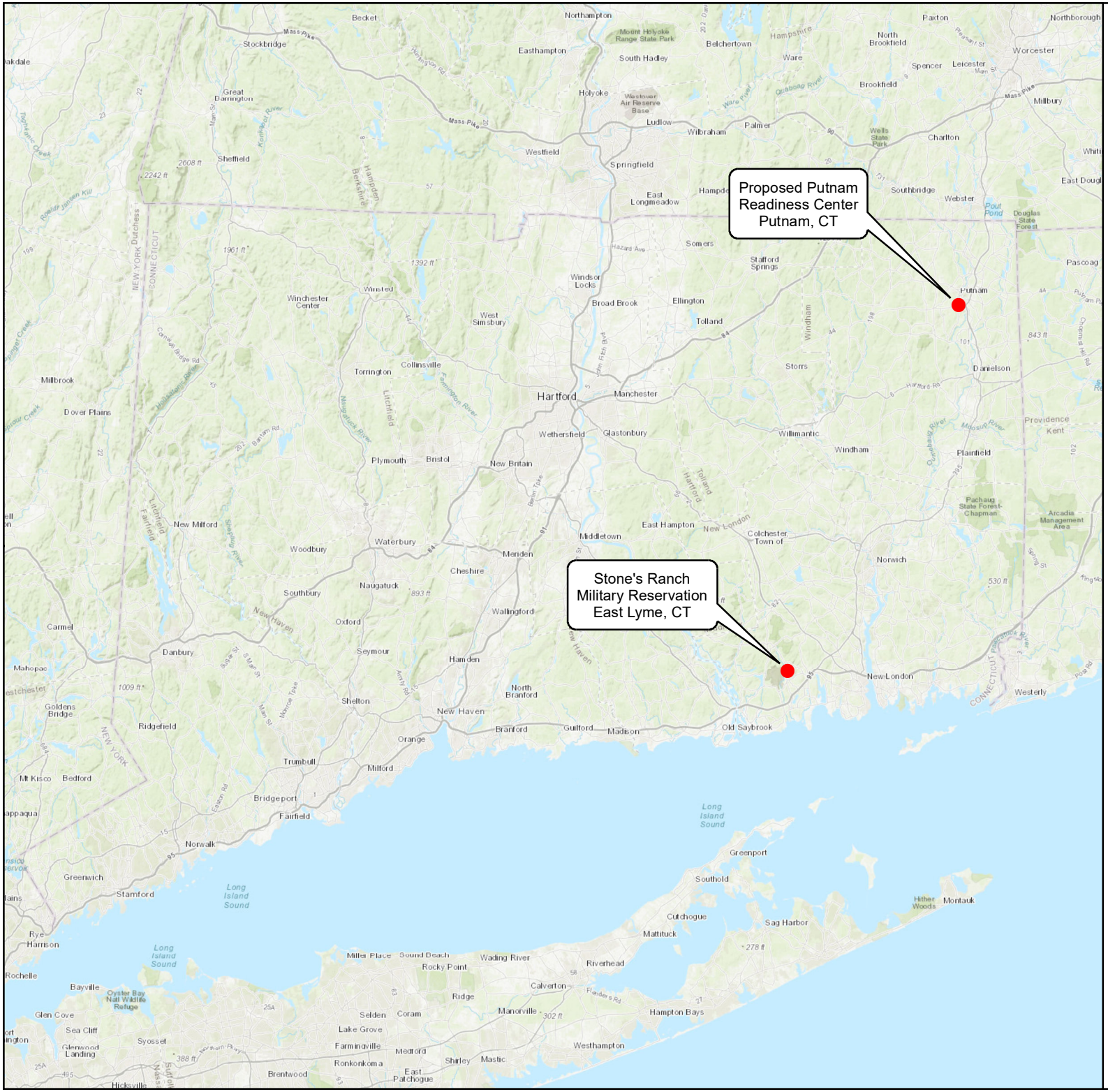
0 100 200 400 Feet

Sources: CTANG, CTDEEP, ESRI

Connecticut Army National Guard
Environmental Assessment for
Proposed Putnam Readiness Center
Putnam, Connecticut

Alternative 4 - Central Building and Direct Wetland Impact

Figure 2.4



Legend

- Potential Location

N

0 5 10 20 Miles

Sources: CTANG, CTDEEP, ESRI

Connecticut Army National Guard Environmental Assessment for Proposed Putnam Readiness Center Putnam, Connecticut

Alternative 5 - Alternative Location

Figure 2.5

APPENDIX A: SCOPING NOTICE LETTERS AND AGENCY COMMENTS

CONNECTICUT ARMY NATIONAL GUARD

PUTNAM READINESS CENTER

APPENDIX A –

SCOPING NOTICE LETTERS AND AGENCY COMMENTS

Notice of Scoping for the Environmental Assessment for the
Connecticut Readiness Center in Putnam, CT
Connecticut Army National Guard

Agencies to Receive Consultation Letters

I. Federal Agencies

USFWS
Mr. Tom Chapman, Field Office Supervisor
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US Army Corps of Engineers
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Mohegan Tribe of Indians of Connecticut
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Mashantucket Pequot Indian Tribe
2 Matt's Path
Mashantucket, CT 06338

II. State Agencies

CT DEEP
Ms. Katie Dykes, Commissioner
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

CT SHPO
Mr. Todd Levine, Environmental Reviewer
Connecticut Department of Economic & Community Development
State Historic Presentation Office
1 Constitution Plaza
Hartford, CT 06103

CT CEQ
Mr. Karl Wagener, Executive Director
Connecticut Council on Environmental Quality
79 Elm Street
Hartford, CT 06106

CT OPM
Mr. Jonathan Harris, Undersecretary
Connecticut Office of Policy and Management
Division of Comprehensive Planning and Intergovernmental Policy
450 Capitol Avenue
Hartford, CT 06106

CT DOT
Mr. Joseph Giulietti, Commissioner
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06111

CT DESPP
Col. George Battle, Commanding Officer
Connecticut Department of Emergency Services and Public Protection
Division of State Police
1111 Country Club Road
Middletown, CT 06457

III. Local Agencies

Mayor
Mayor Barney Seney
126 Church Street
Putnam, CT 06260

Planning Commission
Mr. Gerard Cotnoir, Chairman
Putnam Planning Commission
126 Church Street
Putnam, CT 06260

Zoning Commission
Ms. Patricia Hedenberg, Chairwoman
Putnam Zoning Commission
126 Church Street
Putnam, CT 06260

Inland Wetlands Commission
Putnam Inland Wetlands Commission
126 Church Street
Putnam, CT 06260

Library
Putnam Public Library
225 Kennedy Drive
Putnam, CT 06260

Connecticut Readiness Center in Putnam, CT
Connecticut Army National Guard/Connecticut Military Department

Municipalities where the Proposed Action might be located: Putnam, CT

Address of Proposed Action Location: 376 and 390 Pomfret Street (Route 44) Putnam, CT 06260

Project Description: In compliance with the Connecticut Environmental Policy Act (CEPA) and the National Environmental Policy Act (NEPA), the Connecticut Army National Guard (CTARNG) will prepare an Environmental Assessment (EA) to evaluate the potential environmental, cultural, and socioeconomic impacts of creating a new Readiness Center in the town of Putnam, CT to support the CTARNG 643rd Military Police. The Putnam Readiness Center (PRC) will consist of an assembly hall for Guardsmen to utilize, along with equipment storage areas and parking lots. These facilities will restore the training, administrative, and logistical requirements the CTARNG has lacked in northeast Connecticut for over a decade.

The PRC is planned to be constructed on land owned by the State of Connecticut and previously occupied by the John N. Dempsey Center. See Existing Location figure attached. The Proposed Action for the PRC includes an approximately 45,000 square foot Readiness Center, a parking lot for the CTARNG organization and two privately-owned vehicle parking lots. See attached Proposed Action figure. The Proposed Action is configured to allow for a 150-foot Antiterrorism Force Protection (ATFP) buffer surrounding the readiness center, per Department of Defense requirements.

Alternative designs for the PRC include: 1. A design similar to the Proposed Action that does not allow for a 150-foot ATFP buffer, 2. A design that allows for a 150-ATFP buffer but requires wetland impacts, 3. Construction of the readiness center in a different location, and 4. Not constructing a new readiness center.

Project Maps: Existing Location and Proposed Action figures are attached.

Input Request: The EA identifies, documents, and evaluates the potential environmental, cultural, and socioeconomic effects of the analyzed alternatives in accordance with 32 Code of Federal Regulations Part 651, *Environmental Analysis of Army Actions*, Council on Environmental Quality Regulations, and the ARNG National Environmental Policy Act of 1969 Handbook. The NEPA protocol for an EA requires a public input period of 30 days prior to the

Final EA. Any public comments received by the CTARNG will be addressed and incorporated into the Final EA.

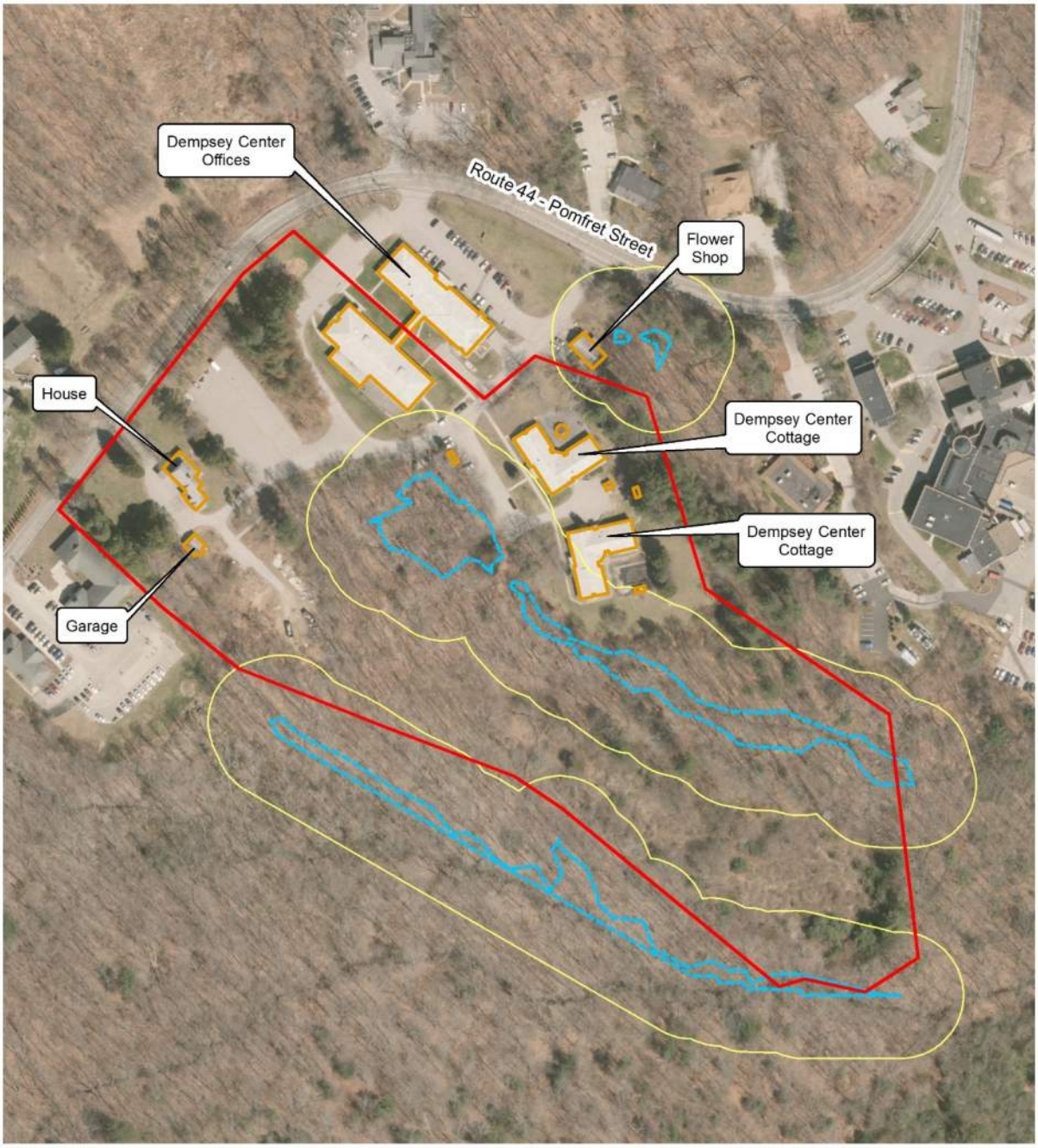
Written comments from the public are welcomed and will be accepted until the close of business on: May 16, 2019.

Public Scoping Meeting: Any person can ask the sponsoring agency to hold a Public Scoping Meeting by sending such a request to the address below. If a meeting is requested by 25 or more individuals, or by an association that represents 25 or more members, the sponsoring agency shall schedule a Public Scoping Meeting.

Such requests must be made by: May 16, 2019.

Written comments, questions and/or requests for a Public Scoping Meeting should be sent to:

Mr. Robert Dollak, Environmental Program Manager
Connecticut Army National Guard
360 Broad Street, Hartford, CT 06105
Robert.f.dollak.nfg@mail.mil
(860) 524-4945



0 100 200 400 Feet

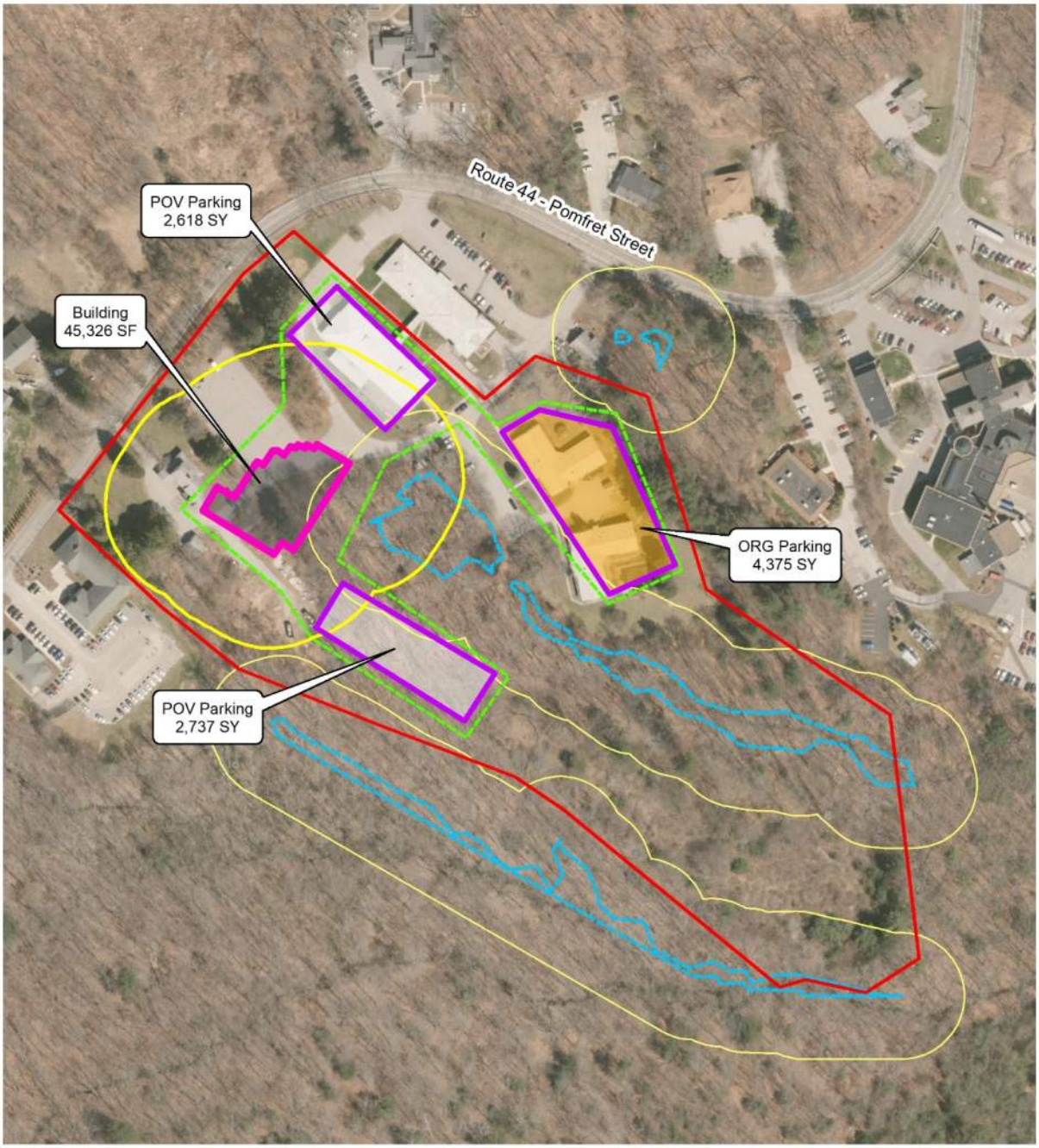
N

Connecticut

Site Boundary
Existing Buildings
Wetland Buffer - 100'
Wetland

Figure 1
Existing Conditions

Sources: CTANG, CTDEEP, ESRI



0 100 200 400 Feet

N

ATFP - 150'
Site Boundary
Building
Parking
Wetland Buffer - 100'
Wetland
Area of Disturbance

Connecticut

Figure 2
Proposed Action

Sources: CTANG, CTDEEP, ESRI

DEPARTMENT OF THE ARMY AND THE AIR FORCE
JOINT FORCE HEADQUARTERS, CONNECTICUT NATIONAL GUARD
WILLIAM A. O'NEILL ARMORY
360 BROAD STREET
HARTFORD, CONNECTICUT 06105 – 3706

14 April 2019

Address

Dear XXX,

In compliance with the Connecticut Environmental Policy Act (CEPA) and the National Environmental Policy Act (NEPA), the Connecticut Army National Guard (CTARNG) will prepare an Environmental Assessment (EA) to evaluate the potential environmental, cultural, and socioeconomic impacts of creating a new Readiness Center in the town of Putnam, CT to support the CTARNG 643rd Military Police. The Putnam Readiness Center (PRC) will consist of an assembly hall for Guardsmen to utilize, along with equipment storage areas and parking lots. These facilities will restore the training, administrative, and logistical requirements the CTARNG has lacked in northeast Connecticut for over a decade.

The PRC is planned to be constructed on land owned by the State of Connecticut and previously occupied by the John N. Dempsey Center. The Proposed Action for the PRC includes an approximately 45,000 square foot Readiness Center, a parking lot for the CTARNG organization and two privately-owned vehicle parking lots. The Proposed Action is configured to allow for a 150-foot Antiterrorism Force Protection (ATFP) buffer surrounding the readiness center, per Department of Defense requirements.

CTARNG requests your participation in the NEPA process as we complete the Environmental Assessment for the Putnam Readiness Center. Please respond within thirty (30) days of receiving this letter with written comments regarding the project and any potential consequences that your agency foresees. Kindly send your written responses via email or regular mail to:

Mr. Robert Dollak, Environmental Program Manager
Connecticut Army National Guard
360 Broad Street, Hartford, CT 06105
Robert.f.dollak.nfg@mail.mil
(860) 524-4945

Thank You,

Mr. Robert Dollak
Environmental Program Manger
Connecticut Army National Guard

Enc: Notice of Scoping

DEPARTMENT OF THE ARMY AND THE AIR FORCE
JOINT FORCE HEADQUARTERS, CONNECTICUT NATIONAL GUARD
WILLIAM A. O'NEILL ARMORY
360 BROAD STREET
HARTFORD, CONNECTICUT 06105 – 3706

14 April 2019

Putnam Inland Wetlands Commission
126 Church Street
Putnam, CT 06260

Dear Commissioners,

In compliance with the Connecticut Environmental Policy Act (CEPA) and the National Environmental Policy Act (NEPA), the Connecticut Army National Guard (CTARNG) will prepare an Environmental Assessment (EA) to evaluate the potential environmental, cultural, and socioeconomic impacts of creating a new Readiness Center in the town of Putnam, CT to support the CTARNG 643rd Military Police. The Putnam Readiness Center (PRC) will consist of an assembly hall for Guardsmen to utilize, along with equipment storage areas and parking lots. These facilities will restore the training, administrative, and logistical requirements the CTARNG has lacked in northeast Connecticut for over a decade.

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Wetlands on the project property were delineated and CTARNG has created multiple designs for the project in order to avoid wetland impact as much as possible. The Proposed Action avoids direct wetland impacts and minimizes wetland buffer impacts while also meeting the needs of the project and Department of Defense standards. With that, CTARNG concludes that the wetland located on the project property will be adequately protected. We appreciate any feedback if you do not concur with this conclusion.

Please respond within thirty (30) days of receiving this letter with written comments regarding the project and any potential consequences that your agency foresees. Kindly send your written responses via email or regular mail to:

Mr. Robert Dollak, Environmental Program Manager
Connecticut Army National Guard
360 Broad Street, Hartford, CT 06105
Robert.f.dollak.nfg@mail.mil
(860) 524-4945

Thank You,

Mr. Robert Dollak
Environmental Program Manager
Connecticut Army National Guard

Enc: Notice of Scoping

DEPARTMENT OF THE ARMY AND THE AIR FORCE
JOINT FORCE HEADQUARTERS, CONNECTICUT NATIONAL GUARD
WILLIAM A. O'NEILL ARMORY
360 BROAD STREET
HARTFORD, CONNECTICUT 06105 – 3706

14 April 2019

Mr. Tom Chapman, Field Office Supervisor
US Fish and Wildlife Service
New England Field Office
70 Commercial Street, Suite 300
Concord, NY 03301

Dear Mr. Tom Chapman,

In compliance with the Connecticut Environmental Policy Act (CEPA) and the National Environmental Policy Act (NEPA), the Connecticut Army National Guard (CTARNG) will prepare an Environmental Assessment (EA) to evaluate the potential environmental, cultural, and socioeconomic impacts of creating a new Readiness Center in the town of Putnam, CT to support the CTARNG 643rd Military Police. The Putnam Readiness Center (PRC) will consist of an assembly hall for Guardsmen to utilize, along with equipment storage areas and parking lots. These facilities will restore the training, administrative, and logistical requirements the CTARNG has lacked in northeast Connecticut for over a decade.

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The Connecticut Department of Energy and Environmental Protection's Wildlife Division conducted a bat survey on the project property in June 2018 to analyze the potential effects of the Proposed Action to endangered, threatened, proposed, and candidate species and critical habitats. The survey detected three species of bats, two of which are Connecticut species of special concern, but none of which are a federally listed species.

Please respond within thirty (30) days of receiving this letter with written comments regarding the project and any potential consequences that your agency foresees. Kindly send your written responses via email or regular mail to:

Mr. Robert Dollak, Environmental Program Manager
Connecticut Army National Guard
360 Broad Street, Hartford, CT 06105
Robert.f.dollak.nfg@mail.mil
(860) 524-4945

Thank You,

Mr. Robert Dollak
Environmental Program Manger
Connecticut Army National Guard

Enc: Notice of Scoping

DEPARTMENT OF THE ARMY AND THE AIR FORCE
JOINT FORCE HEADQUARTERS, CONNECTICUT NATIONAL GUARD
WILLIAM A. O'NEILL ARMORY
360 BROAD STREET
HARTFORD, CONNECTICUT 06105 – 3706

14 April 2019

Mr. Todd Levine, Environmental Reviewer
Connecticut Department of Economic & Community Development
State Historic Preservation Office
1 Constitution Plaza
Hartford, CT 06103

Dear Mr. Levine,

In compliance with the Connecticut Environmental Policy Act (CEPA) and the National Environmental Policy Act (NEPA), the Connecticut Army National Guard (CTARNG) will prepare an Environmental Assessment (EA) to evaluate the potential environmental, cultural, and socioeconomic impacts of creating a new Readiness Center in the town of Putnam, CT to support the CTARNG 643rd Military Police. The Putnam Readiness Center (PRC) will consist of an assembly hall for Guardsmen to utilize, along with equipment storage areas and parking lots. These facilities will restore the training, administrative, and logistical requirements the CTARNG has lacked in northeast Connecticut for over a decade.

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Background research, previous consultation, and archaeological surveys were conducted in order to identify and evaluate historic properties that may be affected by the Proposed Action. A report titled *Phase I Archaeological Reconnaissance Survey of the CTARNG Putnam Regional Readiness Center in the Town of Putnam Connecticut*, dated September 2018, was prepared by Archaeological Consulting Services (ACS) and included SHPO consultation. A historic property found on the site, a Craftsman style historic house, was determined to be non-significant by SHPO. With that, CTARNG concluded the Proposed Action would not cause any adverse effects to significant historic properties. We appreciate any feedback if you do not concur with this conclusion.

Please respond within thirty (30) days of receiving this letter with written comments regarding the project and any potential consequences that your agency foresees. Kindly send your written responses via email or regular mail to:

Mr. Robert Dollak, Environmental Program Manager
Connecticut Army National Guard
360 Broad Street, Hartford, CT 06105
Robert.f.dollak.nfg@mail.mil
(860) 524-4945

Thank You,

Mr. Robert Dollak
Connecticut Army National Guard

Enc: Notice of Scoping

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

79 Elm Street • Hartford, CT 06106-5127 www.ct.gov/deep Affirmative Action/Equal Opportunity Employer

To: Robert Dollak, Environmental Program Manager, Connecticut Army National Guard
360 Broad Street, Hartford CT 06105

From: Linda Brunza- Environmental Analyst **Telephone:** 860-424-3739

Email: Linda.Brunza@ct.gov

Date: 5/16/2019

Subject: Scoping Notice for the proposed construction of a Readiness Center for the Connecticut Army National Guard to support the 643rd Military Police in Putnam.

The Department of Energy and Environmental Protection (DEEP) has received the Notice of Scoping from the Connecticut Army National Guard (CTARNG) for the proposed construction of the Connecticut Readiness Center, which will be located at 376 and 390 Pomfret Street in Putnam. An Environmental Assessment (EA) will be prepared to analyze the environmental, cultural and socio-economic impacts of the project. The project will consist of a 45,000 SF Readiness Center, parking lots and equipment storage areas. The following comments are submitted for your consideration.

Inland Wetlands and Watercourses

DEEP recommends that a certified soil scientist perform a reconnaissance of the site to determine if there are regulated wetlands or watercourses that meet the federal or state definition. Section 404 Water Quality Certification may be needed from the Army Corps of Engineers if federal wetlands are identified and if the project is going to place fill within those areas. If a federal permit is required, DEEP's 401 Water Quality Certification is also required. Any state agency conducting an activity in wetlands must obtain an Inland Wetlands permit from DEEP if the project will directly impact those wetlands. The EA should identify the wetlands on site and state the appropriate permits needed. The preliminary maps included in the Scoping Notice indicate that there may not be construction activity in the identified wetland, unless it is required for anti-terrorism force protection. Any development should avoid wetlands to the maximum extent possible. Unavoidable impacts should be mitigated and buffer areas established to further protect wetlands and watercourses. The EA should address the degree of impact quantified by acreage and should include a discussion of the wetland functions and values that would be lost or impaired.

Further information is available on-line for section 404 Water Quality permitting at Army Corps of Engineers, New England District or by calling the Corps Regulatory Branch in Concord, Massachusetts at 978-318-8338. For further information on DEEP permitting, contact the Land and Water Resources Division at 860-424-3019. A fact sheet regarding 401 Water Quality Certification is available on-line at 401 Certification, and a fact sheet regarding the state's Inland Wetland and Watercourse permit can be found at Inland Wetlands and Watercourses.

Flood Management

The project appears to be in unshaded Zone X on FEMA's Flood Insurance Rate map, which is defined as the 500-year flood with low risk of flooding. Any equipment, generators and fuel storage must be located above the 500-year flood elevation. For state owned land in Zone X, if the work proposed is considered an "activity" as defined in State statute, the project will require floodplain and stormwater management certification pursuant to section 25-68d of the Connecticut General Statutes (CGS), regardless of its location in relation to the floodplain. "Activity" includes any proposed state action that impacts natural or man-made storm drainage facilities that are located on property that the commissioner determines to be controlled by the state. The project would meet this definition if significant new impervious surface, installation/alteration of a stormwater collection system, or site grading that alters drainage patterns were proposed. If that is the case, the sponsoring agency must certify that the activity complies with the stormwater management standards specified in section 25-68h-3 of the Regulations of Connecticut State Agencies (RCSA) and receive approval from DEEP prior to construction. In order to determine whether a project would require certification, additional detailed information concerning the existing extent of impervious surface and the storm drainage at the site in comparison to any additional impervious surface and the proposed site grading and storm drainage system would be required. For further information concerning the applicability of this requirement and details concerning the certification process, contact the Land and Water Resources Division at 860-424-3706. A fact sheet regarding floodplain management and the certification form can be downloaded at Flood Management.

Stormwater

Stormwater discharges from construction sites where one or more acres are disturbed, regardless of project phasing, require an NPDES permit from the Permitting & Enforcement Division. The *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015) will cover these discharges. For projects disturbing five or more acres, registration describing the site and the construction activity must be submitted to DEEP prior to the initiation of construction. A stormwater pollution control plan, including measures such as erosion and sediment controls and post construction stormwater management, must be prepared. A goal of 80 percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing post-construction stormwater management measures. The general permit also requires that post-construction control measures incorporate runoff reduction practices, such as LID techniques, to meet performance standards specified in the permit. Projects defined as Locally Exempt (not requiring a permit from the municipality) that have a disturbance area over one acre must submit a registration form and Stormwater Pollution Control Plan (SWPCP) to DEEP. For further information, contact WPED at 860-424-3018. The construction stormwater general permit registrations can be filed electronically through DEEP's e-Filing system known as ezFile. Additional information can be found on-line at *Construction Stormwater GP.*

Low Impact Development

DEEP recommends that the CTARNG consider opportunities to incorporate green infrastructure and/or low impact development (LID) features to the maximum extent feasible into its plans. Key strategies for effective LID include: managing stormwater close to where precipitation falls; infiltrating, filtering, and storing as much stormwater as feasible; managing stormwater at multiple locations throughout the landscape; conserving and restoring natural vegetation and soils; preserving open space and minimizing land disturbance; designing the site to minimize impervious surfaces; and providing for maintenance and education. Water quality and quantity benefits are maximized when multiple techniques are grouped

together. DEEP has compiled a list of web resources with information about watershed management, green infrastructure and LID best management practices at LID Resources.

Idling

Section 22a-174-18(b)(3)(C) of the RCSA limits the idling of mobile sources to 3 minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites. Adhering to the regulation will reduce unnecessary idling at truck staging zones, delivery or truck dumping areas and further reduce on-road and construction equipment emissions. Use of posted signs indicating the three-minute idling limit is recommended. It should be noted that only DEEP can enforce section 22a-174-18(b)(3)(C) of the RCSA. Therefore, it is recommended that the project sponsor include language similar to the anti-idling regulations in the contract specifications for construction in order to allow them to enforce idling restrictions at the project site without the involvement of DEEP.

EV Readiness

DEEP recommends that 10% of all parking spaces in the project design be made to accept Level 2 electric vehicle charging stations and that half of these parking spaces actually be equipped with Level 2 electric vehicle charging stations. Connecticut and seven other states are obligated, under the multi-state zero emission vehicle (ZEV) memorandum of understanding (MOU), to collectively put 3.3 million ZEVs on our roadways by 2025. Connecticut's share of this target is approximately 150,000 ZEVs. Connecticut is further committed to reduce greenhouse gas emissions by 80% below 2001 levels by 2050 (and a mid- term target of 45% below 2001 levels by 2030), and must also reduce smog-forming motor vehicle pollution in order to meet the federal Clean Air Act's health based ozone standards. To meet these requirements, Connecticut must continue efforts to support the transition to transportation electrification by recommending the installation of electric vehicle (EV) charging infrastructure to support the growing EV market.

Clean Vehicles

DEEP typically recommends the use of newer off-road construction equipment that meets the latest EPA or California Air Resources Board (CARB) standards. If newer equipment cannot be used, equipment with the best available controls on diesel emissions including retrofitting with diesel oxidation catalysts or particulate filters in addition to the use of ultra-low sulfur fuel would be the second choice that can be effective in reducing exhaust emissions. The use of newer equipment that meets EPA standards would obviate the need for retrofits.

DEEP also recommends the use of newer on-road vehicles that meet either the latest EPA or CARB standards for construction projects. These on-road vehicles include dump trucks, fuel delivery trucks and other vehicles typically found at construction sites. On-road vehicles older than the 2007-model year typically should be retrofitted with diesel oxidation catalysts or diesel particulate filters for projects. The use of newer vehicles that meet EPA standards would eliminate the need for retrofits.

Thank you for the opportunity to review this project. These comments are based on the reviews provided by relevant staff and offices within DEEP during the designated comment period. They may not represent all applicable programs within DEEP. Feel free to contact me if you have any questions concerning these comments.

cc: Robert Hannon, DEEP/ OPPD

STATE OF CONNECTICUT

OFFICE OF POLICY AND MANAGEMENT

Comprehensive Planning and Intergovernmental Policy Division

May 16, 2019

Mr. Robert Dollak
Environmental Program Manager
Connecticut Army National Guard
360 Broad Street
Hartford, CT 06105

Re: Notice of Scoping: proposed CTARNG Readiness Center
376 & 390 Pomfret Street, Putnam

Dear Mr. Dollak:

The Office of Policy and Management (OPM) has reviewed the Notice of Scoping for the proposed Connecticut Army National Guard Readiness Center and submits the following comments:

- The scoping notice says the proposed facility has been configured to allow for a 150-ft antiterrorism buffer, per Department of Defense (DoD) requirements, but also mentions that one of the proposed alternative designs does not include the buffer. If the DoD requires such a buffer without exception, the Environmental Assessment (EA) should not include such a design as an alternative. If that alternative can in fact be allowed, the EA should explain how that DoD requirement is applied so the public can understand the available options.

- The scoping notice mentions that one alternative would be to construct the readiness center in a different location. The scoping process might be more effective if the scoping notice identified siting criteria for alternate locations, as well as any such locations that are already under consideration. Doing so would allow the public to provide comments regarding those at this early stage, enabling the draft EA to address any specific public concerns or preference regarding alternative locations. This does not rise to a level that warrants re-scoping and OPM only mentions this so the Connecticut Army National Guard can consider it as a suggestion when preparing scoping notices for any future projects.

Thank you for the opportunity to respond to this Notice of Scoping and please feel free to contact me if you have any questions.

Sincerely:

Bruce Wittchen
Office of Policy & Management
450 Capitol Ave, MS# 54ORG
Hartford, CT 06106
(860) 418-6323
bruce.wittchen@ct.gov

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104
http://www.fws.gov/newengland

In Reply Refer To: November 17, 2020
Consultation Code: 05E1NE00-2021-SLI-0457
Event Code: 05E1NE00-2021-E-01376
Project Name: CTARNG PRC

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
(603) 223-2541

Project Summary

Consultation Code: 05E1NE00-2021-SLI-0457

Event Code: 05E1NE00-2021-E-01376

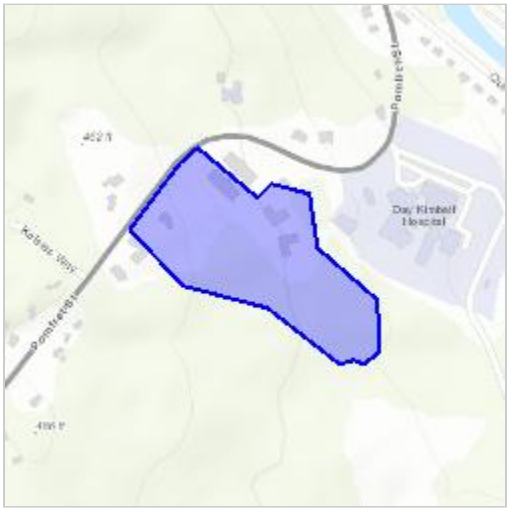
Project Name: CTARNG PRC

Project Type: DEVELOPMENT

Project Description: The project includes construction and operation of a readiness center on a 17.00-acre portion of a 19.67-acre State-owned property on Pomfret Street (Route 44) in Putnam, Connecticut. The property is currently occupied by several large paved parking areas connected by driveways, two Department of Developmental Services (DDS) buildings, and a large forested area. Under existing conditions, approximately 6.2 acres of the site have been previously disturbed, including 1.27 acres of existing 100-foot wetland buffer disturbance. The total area of permanent disturbance for the project is approximately 6.56 acres.

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/41.90603399955627N71.91764125439181W



Counties: Windham, CT

Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

Connecticut Commission on Culture & Tourism

Historic Preservation & Museum Division

59 South Prospect Street
Hartford, Connecticut
06106

(v) 860.566.3005
(f) 860.566.5078

April 19, 2007

Ms. Lisa Melnicsak
Connecticut Military Department
360 Broad Street
Hartford, CT 06105

Subject: Westbrook Armory
37 Brookside Avenue
Westbrook, CT

Dear Ms. Melnicsak:

The State Historic Preservation Office has reviewed the above-named project. This office notes that the Westbrook Armory lacks historical significance and architectural distinction and is not eligible for the National Register of Historic Places. Therefore, this office expects that the proposed project will have no effect on Connecticut's historic, architectural, and archaeological resources.

This office appreciates the opportunity to have reviewed and commented upon the proposed project.

This comment is provided in accordance with the National Historic Preservation Act and the Connecticut Environmental Policy Act.

For further information please contact Dr. David A. Poirier, Staff Archaeologist.

Sincerely,

Karen Senich
Deputy State Historic Preservation Officer

APPENDIX B: GREENHOUSE GAS EMISSION DATA

APPENDIX B
CONNECTICUT ARMY NATIONAL GUARD
GREENHOUSE GAS AND CARBON DIOXIDE EQUIVALENT EMISSIONS CALCULATIONS- STATE REQUIREMENTS

1. Pursuant to RCSA 22a-174-3a(a)(1)(H), potential and actual greenhouse gas emissions >= 100 tons/year AND CO_2e >= 100,000 tons/year have to apply for a permit (both conditions have to be met in order to apply).

Facility	GHG calculation												CO2e calculation												STATE REQUIREMENTS		
	Natural Gas Fired Equipment		LPG-fired Equipment		Diesel Emergency Engine		Jet Fuel		Oil-fired Equipment		**Total Potential GHG Emission (tons/yr)**	**Total Actual GHG Emission (tons/yr)**	Natural Gas Fired Equipment		LPG-fired Equipment		Diesel Engine		Jet Fuel		Oil-fired Equipment		**Total Potential CO_2e Emission (tons/yr)**	**Total Actual CO_2e Emission (tons/yr)**	**Potential and Actual GHG Emission >= 100 tons/year**	**Potential and Actual Co2e Emission >= 100,000 tons/year**	**State Permit Needed**
	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)			Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)					
Avon	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	11	11	11	No	No	No
Branford	120	0	0	0	11	0	0	0	0	0	131	1	121	0	0	0	12	0	0	0	8	8	140	8	Yes	No	No
East Haven Rifle	0	0	125	6	0	0	0	0	0	0	125	6	0	0	125	6	0	0	0	0	0	0	125	6	Yes	No	No
East Lyme	0	0	1,194	114	18	0	0	0	0	0	1,212	115	0	0	1,194	115	20	0	0	0	0	0	1,214	115	Yes	No	No
Enfield	1,020	10	0	0	0	0	0	0	0	0	1,020	10	1,026	10	0	0	0	0	0	0	0	0	1,026	10	Yes	No	No
Groton	0	0	1,238	83	19	2	34	0	0	0	1,290	85	0	0	1,238	83	20	2	34	0	0	0	1,293	85	Yes	No	No
Hartford	300	15	0	0	139	2	0	0	0	0	439	16	302	15	0	0	239	3	0	0	0	0	541	17	Yes	No	No
New Britain	1,440	5	0	0	0	0	0	0	0	0	1,440	5	1,449	5	0	0	0	0	0	0	0	0	1,449	5	Yes	No	No
New Haven Joint	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	No	No	No
New London	2,340	21	0	0	23	0	0	0	0	0	2,363	22	2,354	21	0	0	26	0	0	0	0	0	2,380	22	Yes	No	No
Newtown	0	0	488	15	0	0	0	0	0	0	488	15	0	0	488	15	0	0	0	0	0	0	488	15	Yes	No	No
Niantic	0	0	7,456	294	244	9	0	0	0	0	7,700	303	0	0	7,459	295	548	20	0	0	8	8	8,015	322	Yes	No	No
Norwich	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	No	No	No
Rockville	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	No	No	No
Southington	1,200	11	0	0	65	3	0	0	0	0	1,265	14	1,207	11	0	0	86	5	0	0	0	0	1,293	15	Yes	No	No
Stratford	2,460	39	0	0	42	2	0	0	0	0	2,503	41	2,475	39	0	0	52	2	0	0	0	0	2,527	41	Yes	No	No
Waterbury	2,100	33	0	0	46	1	0	0	0	0	2,146	34	2,113	33	0	0	57	1	0	0	0	0	2,170	34	Yes	No	No
Westbrook	0	0	0	0	11	0	0	0	0	0	11	0	0	0	0	0	12	0	0	0	0	0	12	0	No	No	No
Windsor Locks AASF	12,660	225	0	0	214	5	0	0	0	0	12,874	230	12,737	227	0	0	448	10	0	0	0	0	13,185	237	Yes	No	No
Windsor Locks Camp Hartell	9,300	330	431	17	0	0	0	0	0	0	9,732	347	9,357	332	431	17	0	0	0	0	0	0	9,788	349	Yes	No	No

Notes:
1. Greenhouse gases (GHG) include carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), sulfur hexaflouride (SF6), any hydrofluorocarbon (HFC) or any perfluorocarbon (PFC).
2. Total greenhouse gas (GHG) emission includes carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O). Sulfur hexaflouride (SF6), any hydrofluorocarbon (HFC) or any perfluorocarbon (PFC) are negligible and not included in the total.
3. 8,760 hours per year was used when potential emission was calculated for natural gas-, LPG-, and oil-fired equipments.
4. 300 hours per year was used when potential emission was calculated for diesel emergency engines.
5. Emission factors were derived from EPA AP-42 and U.S. Energy Information Administration, Voluntary Reporting of Greenhouse Gases Program,Tables 1 thru 7.
6. Global warming potential was derived from Table A-1 of 40 CFR 98, Subpart A.
7. CO_2e= carbon dioxide equivalent emissions of GHGs as defined in RCSA 22a-174-1(21)
8. Portable (temporary) engines are not required for inclusion in greenhouse gas emissions calculations.

APPENDIX B
CONNECTICUT ARMY NATIONAL GUARD
GREENHOUSE GAS AND CARBON DIOXIDE EQUIVALENT EMISSIONS CALCULATIONS- FEDERAL REQUIREMENTS

1. Pursuant to 40 CFR 98.2, the GHG reporting requirements and related monitoring, recordkeeping, and reporting requirements of this part apply to the owners and operators of a facility that in any calendar year starting in 2010 meets all three of the conditions listed below:
   a) The source category associated with the facility is not listed in Table A-3 or Table A-4
   b) The aggregate maximum rated heat input capacity of the stationary fuel combustion units at the facility is 30 MMBtu/hr or greater.
   c) The facility emits 25,000 metric tons CO_2e or more per year in combined emissions from all stationary fuel combustion sources.

Facility	GHG calculation											CO2e calculation										FEDERAL REQUIREMENTS		
	Natural Gas Fired Equipment		LPG-fired Equipment		Jet Fuel		Oil-fired Equipment		**Sitewide MMBtu/hr**	**Total Potential GHG Emission (tons/yr)**	**Total Actual GHG Emission (tons/yr)**	Natural Gas Fired Equipment		LPG-fired Equipment		Jet Fuel		Oil-fired Equipment		**Total Potential CO_2e Emission (tons/yr)**	**Total Actual CO_2e Emission (tons/yr)**	**Max. heat input capacity = or > than 30 MMBtu/hr (Note b)**	**Max. CO_2e Emission <25,000 TPY**	**Federal Reporting Needed**
	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)				Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)	Potential emission (tons/yr)	Actual emission (tons/yr)					
Avon	0	0	0	0	0	0	0	0	5	0	0	0	0	0	0	0	0	11	11	11	11	No	Yes	No
Branford	120	0	0	0	0	0	0	0	5	120		121	0	0	0	0	0	8	8	129	8	No	Yes	No
East Haven Rifle	0	0	125	6	0	0	0	0	0	125	6	0	0	125	6	0	0	0	0	125	6	No	Yes	No
East Lyme	0	0	1,194	114	0	0	0	0	5	1,194	114	0	0	1,194	115	0	0	0	0	1,194	115	No	Yes	No
Enfield	1,020	10	0	0	0	0	0	0	3	1,020	10	1,026	10	0	0	0	0	0	0	1,026	10	No	Yes	No
Groton	0	0	1,238	83	34	0	0	0	77	1,272	83	0	0	1,238	83	34	0	0	0	1,272	83	Yes	Yes	No
Hartford	300	15	0	0	0	0	0	0	1	300	15	302	15	0	0	0	0	0	0	302	15	No	Yes	No
New Britain	1,440	5	0	0	0	0	0	0	3	1,440	5	1,449	5	0	0	0	0	0	0	1,449	5	No	Yes	No
New Haven Joint	2,940	17	0	0	0	0	0	0	5	2,940	17	0	0	0	0	0	0	0	0	0	0	No	Yes	No
New London	2,340	21	0	0	0	0	0	0	5	2,340	21	2,354	21	0	0	0	0	0	0	2,354	21	No	Yes	No
Newtown	0	0	488	15	0	0	0	0	1	488	15	0	0	488	15	0	0	0	0	488	15	No	Yes	No
Niantic	0	0	7,456	294	0	0	0	0	18	7,456	295	0	0	7,459	295	0	0	8	8	7,467	302	No	Yes	No
Norwich	0	0	0	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	No	Yes	No
Rockville	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	No	Yes	No
Southington	1,200	11	0	0	0	0	0	0	2	1,200	11	1,207	11	0	0	0	0	0	0	1,207	11	No	Yes	No
Stratford	2,460	39	0	0	0	0	0	0	5	2,460	39	2,475	39	0	0	0	0	0	0	2,475	39	No	Yes	No
Waterbury	2,100	33	0	0	0	0	0	0	4	2,100	33	2,113	33	0	0	0	0	0	0	2,113	33	No	Yes	No
Westbrook	0	0	0	0	0	0	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	No	Yes	No
Windsor Locks AASF	12,660	225	0	0	0	0	0	0	8	12,660	225	12,737	227	0	0	0	0	0	0	12,737	227	No	Yes	No
Windsor Locks Camp Hartell	9,300	330	431	17	0	0	0	0	8	9,732	347	9,357	332	431	17	0	0	0	0	9,788	349	No	Yes	No

Notes:
1. Greenhouse gases (GHG) include carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), sulfur hexaflouride (SF6), any hydrofluorocarbon (HFC) or any perfluorocarbon (PFC).
2. Total greenhouse gas (GHG) emission includes carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O). Sulfur hexaflouride (SF6), any hydrofluorocarbon (HFC) or any perfluorocarbon (PFC) are negligible and not included in the total.
3. 8,760 hours per year was used when potential emission was calculated for natural gas-, LPG-, and oil-fired equipments.
4. 300 hours per year was used when potential emission was calculated for diesel emergency engines.
5. Emission factors were derived from EPA AP-42 and U.S. Energy Information Administration, Voluntary Reporting of Greenhouse Gases Program,Tables 1 thru 7.
6. Global warming potential was derived from Table A-1 of 40 CFR 98, Subpart A.
7. CO_2e= carbon dioxide equivalent emissions of GHGs as defined in RCSA 22a-174-1(21)
8. Emergency and portable engines as defined in 40 CFR 98.6 are not required for inclusion in greenhouse gas emission calculations.